



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7  
25 FUNSTON ROAD  
KANSAS CITY, KANSAS 66115

REC'D

MAR 12 1999

RESP

FEB 04 1999

MEMORANDUM

SUBJECT: Transmittal of Used Oil Inspection Report - RCRA

FROM: Alma Moreno Lahm *Alma Moreno Lahm 1/19/99*  
Environmental Engineer, ENSV/ARCM

TO: Jo Ann Heiman  
Chief, RESP/ARTD

This memorandum transmits the following Used Oil Inspection report performed under a work assignment managed by the Environmental Services Division, Air & RCRA Compliance Branch.

<u>Facility</u>	<u>EPA ID Number</u>	<u>Date of Inspection</u>
Jebro Inc. 2303 Bridgeport Drive Sioux City, IA 51111	IAD020201604	September 1, 1998

Attachments

ENFORCEMENT  
CONFIDENTIAL



R00126656  
RCRA RECORDS CENTER  
0001



FEB 04 1999

**MEMORANDUM**

SUBJECT: CFC Checklist Transmittal

FROM: Alma Moreno Lahm, Environmental Engineer  
ENSV, Air RCRA and Compliance Monitoring Branch (ENSV/ARCM)

TO: Alice Law, CFC Enforcement Coordinator  
Air Permitting and Compliance Branch

No CFC checklist was completed for the following site in Iowa.

<u>Facility</u>	<u>EPA ID Number</u>	<u>Date of Inspection</u>
Jebro Inc. 2303 Bridgeport Drive Sioux City, IA 51111	IAD030301604	September 1, 1998

If you have any questions, please contact me at extension 5232.

ENSV:ARCM:C:\USER\AMORENO\09RO7047\CFCTRSTD.MEM:JEBROINC.IAD.CFC:AML:20JAN99

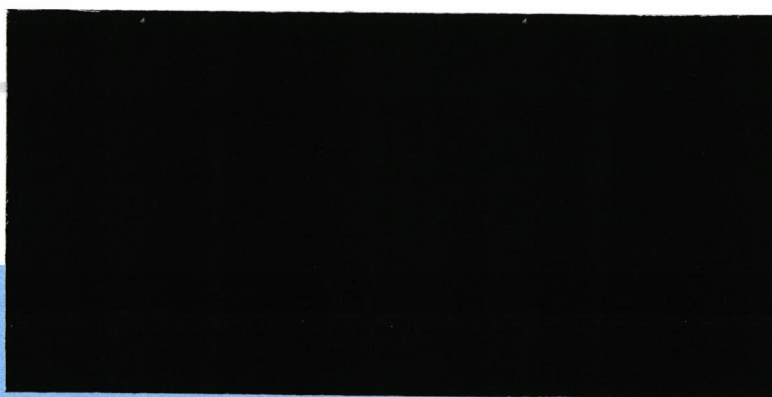
ARCM  
MORENO LAHM

*Alma Moreno Lahm*  
*2/3/99*





**U.S. Environmental Protection Agency**  
**Contract No. 68-W4-0004**



**RCRA Enforcement, Permitting, and  
Assistance Contract—EPA Zone III**



**Tetra Tech EM Inc.**

**RCRA CBI**  
**Confidential**



Printed on recycled paper

REC'D

MAR 12 1999

RESP

IOWA USED OIL INSPECTION  
JEBRO INC.  
IAD020201604  
2303 BRIDGEPORT DRIVE  
SIOUX CITY, IOWA 51111

Prepared for:

U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region 7  
Kansas City, Kansas 66101

Work Assignment Number	: R07047
EPA Region	: 7
Date Inspected	: September 1, 1998
Date Prepared	: December 11, 1998
Contract Number	: 68-W4-0004
EPA Work Assignment Manager	: Alma Moreno Lahm
Telephone Number	: (913) 551-5232
Prepared By	: Tetra Tech EM Inc.
Tetra Tech Project Manager	: Andrew Mazzeo
Telephone Number	: (913) 495-3940

ENFORCEMENT  
CONFIDENTIAL

RECEIVED  
DEC 31 1998  
ARCM/ENSV

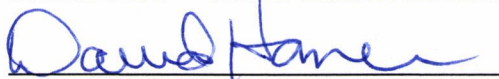
**SUMMARY OF RCRA USED OIL INSPECTION**  
**JEBRO, INC.**  
**2303 BRIDGEPORT DRIVE**  
**SIOUX CITY, IOWA 51111**  
**IAD020201604**

**Inspection Participants:** Mr. David Homer, Tetra Tech EM Inc.  
Ms. Lisa Wilson, Tetra Tech EM Inc.  
Mr. Michael K. Marlow, General Manager, Jebro Inc.  
Ms. Susan Lowery, Safety Supervisor, Jebro Inc.

**Inspection Date:** September 1, 1998

**List of Attachments:** Attachment A -- Confidential Business Information Forms  
Attachment B -- Notice of Preliminary Findings  
Attachment C -- Photographic Log  
Attachment D -- Inspection Checklists  
Attachment E -- Other Supporting Documents  
Attachment F -- RCRIS Handler Information Report

**Submitted By:**

  
David Homer  
Environmental Toxicologist

The Tetra Tech inspection team inspected the Jebro Inc. (Jebro) facility on September 1, 1998, as a used oil transporter, transfer facility, processor, and fuel marketer. The team used the used oil inspection form (Attachment D) as a basis for the inspection. The form, however, does not cover the complete requirements for a used oil transporter, processor, and fuel marketer. The purpose of this summary is to provide additional information on Jebro's activities as a transporter, processor, and fuel marketer, and should be viewed as a supplement to the used oil inspection form.

The inspection began at 13:00 with introductions and I explained the purpose of the inspection and the authority to conduct this inspection. I reviewed the facilities right to claim information as business confidential, during the inspection information was claimed as business confidential by Mr. Michael Marlow, General Manager. The information claimed as confidential is the data on the number of tanks at the facility, their capacity, and any pictures of the facility. The inspection consisted of a review of the activities at the site, a site tour, and a review of relevant electronic records and other documents.

Mr. Marlow stated that Jebro's main operation is liquid asphalt manufacturing. He stated that used oil is used in various portions of the asphalt manufacturing process; it is blended with heavier asphalt to make a lighter product, used as fuel at the plant, and sold as a fuel to asphalt batch plants.

Mr. Marlow stated Jebro, as a transporter, collects used oil from over 800 locations in Iowa, Nebraska, and South Dakota. Since Jebro is a transporter, they are subject to the requirements of 40 Code of Federal Regulations (CFR) 279 Subpart E. To meet these requirements, Jebro submitted a notification of hazardous waste activity form to the Environmental Protection Agency (EPA) on October 8, 1996 and received an EPA hazardous waste ID No. IAD020201604. Mr. Marlow explained that all used oil is transported to its facility in Sioux City, Iowa. Jebro has established procedures the drivers must follow



when accepting used oil for shipment to its facility. These procedures, as described by Mr. Marlow, are presented in the following paragraph.

The Jebro drivers are responsible for evaluating the used oil at pick up. They use their knowledge of clients' processes and an electronic sniffer to check for light end products. If the used oil fails the sniffer test, then the driver uses a chlortest kit to check for halogens. If the used oil fails this test, it is not picked up, and the driver leaves the bill of lading, unless the client provides a full chemical analysis to verify that the used oil is lower than the 1,000 parts per million (ppm) halogen limit. This procedure is meant to ensure compliance with 40 CFR 279.44. Mr. Marlow stated that Jebro keeps a hard copy of the bill of lading for each shipment for at least 3 years. Jebro maintains an electronic data base of the information from the bills of lading that date back to 1989. I reviewed a number of these bills of lading and found them in compliance with 40 CFR 279.46. The bills of lading identify the date of shipment, the generator of the used oil, and the volume of used oil accepted. During the inspection I did not observe any bills of lading that had a full chemical analysis attached supporting its compliance with the 1,000 ppm halogen limit. Mr. Marlow stated that it is very rare that supporting documentation would be provided.

Mr. Marlow explained once the used oil arrives at the facility it is unloaded into the 300 series tanks. There are 4 tanks in this series and the capacity of each tank is given below.

Tank No. 343	21,000 gallons
Tank No. 344	17,000 gallons
Tank No. 347	20,000 gallons
Tank No. 348	17,000 gallons

Mr. Marlow stated that all these tanks are connected via piping and pumps to allow for oil to be moved between the various tanks as needed. The oil from the 300 series tanks is pumped to Tank No. 20 the main supply tank and kept at 160 °F in order for the oil to be atomized in burners. Once a month, the content of this tank is sampled to determine whether the used oil meets specifications (40 CFR 279.11). Midwest Laboratory, Omaha, Nebraska, performs the analytical tests on the oil. The oil from Tank No. 20 is either piped to on-site boilers or to racks for shipment off site for use in asphalt batch plants. Jebro maintains a computer data base that tracks each off-site shipment of used oil. I reviewed the data base and found that it contains the following information on each shipment of used oil- date of shipment, destination of the shipment, volume of used oil shipped, and an analysis certification number. Mr. Marlow stated that each analysis is given a certification number and Jebro assigns the appropriate analysis certification number for each used oil shipment. The data base cross references the used oil shipments to the monthly analysis of used oil from Tank No. 20 by certification number. Mr. Marlow stated that oil from Tank No. 20 is also pumped to Tanks No. 15, 18, and 29 for on-site storage prior to burning in heaters or boilers. Tank No. 18 is the supply tank for hot oil heater in the "poly area."

Jebro acts as a used oil processor through its blending of used oil with asphalt to obtain the necessary job specifications. As noted earlier, Jebro has notified as a processor. Jebro is required to meet the general facility standards, 40 CFR 279.52. I reviewed the operation plan for the facility and observed the operation during the visual inspection of the facility. I found that the facility was operated and maintained in a manner to minimize releases and explosions as required in 40 CFR 279.52(a)(1). During the visual inspection I observed that the facility had the specific equipment and communications devices required in 40 CFR 279.52(a)(2)(3) and (4). No deficiencies were noted during the inspection.

During the visual inspection, I observed that there was adequate space between all tanks on site to meet the requirements of 40 CFR 279.52(a)(5). Mr. Marlow stated that the facility is inspected by the fire department at least once a year. During the inspection the fire department is briefed on materials handled, layout of the facility, and evacuation routes as required in 40 CFR 279.52(a)(6).

I reviewed the facility's contingency plan for compliance with 40 CFR 279.52(b) and no deficiencies were noted.

40 CFR 279.53 requires that Jebro provide information on the halogen content of the used oil. As explained earlier, Mr. Marlow stated Jebro samples Tank No. 20 once per month to ensure that the used oil meets the specifications. I reviewed the electronic data base and several analytical reports and did not identify any halogen concentrations greater than 1,000 ppm, confirming that the used oil is not a hazardous waste.

Used oil management requirements are outlined in 40 CFR 279.54. Mr. Marlow stated that Jebro stores all used oil in tanks at its facility, no containers are used and that all tanks are located in areas with secondary containment. I confirmed this information during the visual site inspection. Tetra Tech received a follow-up e-mail from Jebro on September 4, 1998 providing information on the volumes of the tanks and of the secondary containment areas for each tank (Attachment E). The message also stated that all secondary containment areas were constructed with 2 feet of compacted clay. I reviewed this information and found no deficiencies with the requirements.

As part of the inspection, I reviewed the site analysis plan, tracking system, and operating record. No deficiencies were noted with the requirements in 40 CFR 279.55, 279.56, 279.57, 279.58, and 279.59.

Jebro notified EPA that it acts as a used oil fuel marketer. Mr. Marlow stated that Jebro sells used oil as a fuel to be used in batch asphalt plants. Jebro, as described earlier, maintains an electronic database which tracks all off-site shipments of used oil and the associated certification number corresponding to appropriate the laboratory analysis performed on a sample from Tank 20, the supply tank. Mr. Marlow stated that Jebro does not provide a certification of oil quality with each shipment, although Jebro markets the oil as specification used oil. According to 40 CFR 279.61(a)(1) facilities that meet the definition of an industrial furnace are allowed to burn off-specification used oil. Mr. Marlow stated that the batch asphalt plants meet the definition of industrial furnace and the batch plants are able to accept and burn off-specification oil.

Subsequent to the inspection, Tetra Tech requested a material safety data sheet (MSDS) on the used oil that is sold for off-site use. Mr. Marlow faxed a copy of the MSDS (see Attachment E) to Tetra Tech on October 13, 1998, stating that the oil is marketed as "specification used oil."

I reviewed Jebro's notification form and shipment tracking data base for the used marketer requirements, 40 CFR 279.7 Subpart H. No deficiencies were noted during the inspection.

The inspection also included the completion of the used oil inspection form. It should be noted that the form requests the name and address of all facilities that use Jebro as a transporter of used oil. Mr. Marlow stated that this information is considered business confidential, and Jebro would supply the information directly to EPA, if requested in writing.



The inspection concluded with a discussion of the notice of preliminary findings of the inspection (see Attachment 2). The only violation noted was that Tank No. 343 was not labeled with the words "used oil" as required by 40 CFR 279.54(f). A global positioning reading was taken at the facility and the inspection concluded at 1500.

**ATTACHMENT A**

**CONFIDENTIAL BUSINESS INFORMATION FORMS**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

1AD0202016004

Facility Name <i>Tebro Inc.</i>	
Facility Address <i>2303 Bridgeport Dr. , Sioux City, IA. 51111</i>	
Inspector (print) <i>David Homer</i>	
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115 <i>Tetra Tech EM Inc.</i>	Date <i>09/01/98</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date
<i>Susan Lowrey</i>	<i>Susan Lowrey</i> 9-1-98

Information for which confidential treatment is requested:

A) Tank information - capacities, volumes, storage, products

B) Facility photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

1AD0702010904

Facility Name <u>Tebro Inc.</u>
Facility Address <u>2303 Bridgeport Dr., Sioux City, IA. 51111</u>

Documents Collected? YES\_\_\_ (list below) NO\_\_\_

Samples Collected? YES\_\_\_ (list below) NO\_\_\_ Split Samples: YES\_\_\_ NO\_\_\_

Documents/Samples were: 1)Received no charge\_\_\_ 2)Borrowed\_\_\_ 3)Purchased\_\_\_

Amount Paid: \$\_\_\_ Method: Cash\_\_\_ Voucher\_\_\_ To Be Billed\_\_\_

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- Photos (2) - front of facility (sign and tanks)  
tank #343 missing "used oil" placard  
(2) Bill of lading #s 038700 and 038704 (pickups) from Hawkins Construction Fred's  
(1) Bill of lading # 22423 to Brewer Construction (delivery) Friendly, Inc.  
(2) Reports of Analysis of Tank #20 from Mid West Laboratories, Inc. (98-210-2024 and  
98-225-2074)  
(1) Report of Analysis of used oil sludge (strainer) from Mid West Laboratories, Inc. (98-104-2036)

Facility Representative (print) <u>Susan Laorey</u>	Signature/Date <u>Susan Laorey</u> <u>9-1-98</u>
Inspector (print) <u>David H Homer</u>	Signature/Date <u>David H Homer</u> <u>9/1/98</u>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	



**ATTACHMENT B**  
**NOTICE OF PRELIMINARY FINDINGS**



NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Tebro Inc.  
ADDRESS: 2303 Bridgeport Drive  
Sidney City, IA. 51111  
EPA ID NUMBER: IA0020201004 DATE: 09/01/98

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failure to label used oil tank # 343 with the words "used oil"  
40 CFR 279.22(c).
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_

If you have any questions regarding these findings please contact \_\_\_\_\_

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Susan Lowrey TITLE: Safety and Human Resource Supervisor  
SIGNATURE: Susan Lowrey 9-1-98

This document was prepared by David Hower

**ATTACHMENT C**  
**PHOTOGRAPHIC LOG**



**JEBRO, INC.**  
**Sioux City, Iowa**



**Photo No:** 1 **Direction Facing:** Northwest **Photographer:** Lisa K. Wilson  
**Date:** 09/01/98, 1410 **Description:** Used oil tank #343 with "used oil" placard missing.



**Photo No:** 2 **Direction Facing:** Northwest **Photographer:** Lisa K. Wilson  
**Date:** 09/01/98, 1446 **Description:** Sign and tanks as viewed from entrance of parking lot on Bridgeport; silver tank #5 is used oil, the rest are asphalt.

**ATTACHMENT D**  
**INSPECTION CHECKLISTS**





## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

## USED OIL INSPECTION FORM

Company Name	Jebro Inc.	EPA Identification Number	TAD 02 02 016 004
Address & Zip	2303 Bridgeport Dr. Sioux City, IA - 51111	Telephone Number	712-277-8855
		Fax Number	712-277-8451
Company Contact	Susan Lowrey Michael K. Marlow <del>SA</del>	Title Safety Supervisor. General Manager Petroleum Recovery	
Investigator	David Homer	Investigation Date	09/01/98
At This Location Since		1972	
Number Of Employees		36	
Facility Size		32.5 acres	
Business Type		liquid asphalt manufacturing	
Used Oil Management Activities		Pickup used oil, transporter, storage, burned as fuel, blending agent, and sales to portable asphalt plants	
1	Describe How Used Oil Filters Are Generated		
	none		
2	Used Oil Filter Generation Rate		
	not generated		

RECYCLE ♻️



3	Describe How Used Oil Filters Are Drained & Managed On-site (Obtain Photographic Documentation)
	not applicable
4	How & Where Are Used Oil Filters Disposed Of? (Obtain Written Documentation)
	not applicable
5	Amount of Used Oil Filters On-site
	not applicable
6	List the Processes That Generate Used Oil
	no generation
7	Describe How the Used Oil Generated from Each Process Is Managed On-site
	no generation
8	Used Oil Generation Rate
	not generated

9	State the Number and Size of Used Oil Storage Containers and Tanks On-site & the Amount of Used Oil in Each Tank and Container		
			Current level
	Tank 5	1000,000 gallon capacity	515,928 gallons
	18	9,900 gallon	5,232 gallons
	20	83,000 gallons	52,272 gallons
	29	8,000 gallons	3,542 gallons
	343	21,000 gallons	4,142 gallons
	344	17,000 gallons	14,263 gallons
	348	17,000 gallons	2,803 gallons
	347	20,000 gallons	— empty
10	State How Each Tank and Container Containing Used Oil Is Labeled		
	343 not labeled with "used oil" all other tanks had proper labeling.		
11	For Each Tank and Container Containing Used Oil That Is Not in Good Condition, Describe the Condition of the Container /Tank (Obtain Photographic Documentation)		
	All tanks in good condition		
11a	Describe Any Secondary Containment (Obtain Photographic Documentation)		
	Has secondary containment for all tanks, bermed with earthen dikes.		



12	Describe Any Used Oil Spills or Staining Found On-site (Obtain Photographic Documentation)
	<p>no spills found at the site.</p>
13	Describe Used Oil/hazardous Waste Mixing Activities
	<p>no mixing of hazardous waste on-site.</p>
14	Is used oil burned in on-site space heater?
	<p>If So State How Much Used Oil Is Burned per Year, the Design Capacity of the Space Heater, and If the Heater Combustion Gases Are Vented to the Outside</p> <p>no space heaters on-site.</p>

15	State Name, Address, Telephone Number, & Epa Identification Number of the Transporter That Picks up the Used Oil (Obtain Written Documentation)	
Company Name		EPA Identification Number
All transportation is self transporting		
Address		Telephone Number
& Zip		
Company Name		EPA Identification Number
Address		Telephone Number
& Zip		
16	If used oil is collected under a tolling arrangement, obtain a copy of the agreement/contract.	
	Not applicable	
17	Describe generator used oil self- transportation activities	
	no self transportation - facility is a transporter of used oil. Picks up from generators and delivers oil to batch <del>put</del> plants.	
18	State the amount of used oil collected from do-it-yourselfers per month	
	no collection from do-it-yourselfers	



19 State the amount of used oil collected from businesses per month

200,000 gallons/month approx.

20 If Used Oil Is Collected from Other Businesses.  
Obtain a Copy of the Registration/ Permit/ License/ Authorization from the State / County/ Municipal Government That Allows the Company to Run a Used Oil Collection Center.

Has notified EPA as a used oil generator, fuel marketer, and transfer facility.

If No Such Documentation Is Available. Please State Such:

21 If Used Oil Is Collected from Other Businesses.  
Are Shipments of Greater than 55 Gallons Accepted?

Yes.

If So State the Following for Each Such Business:

800 customers if EPA wants

Business Name

Telephone #

the list, will have it requested in writing or letter from EPA.

Address & Zip

Contact Name

Name

Telephone #

Address & Zip

Contact Name

Name

Telephone #

Address & Zip

Contact Name

Name

Telephone #

Address & Zip

Contact Name





**LIST OF HANDOUTS PROVIDED TO THE FACILITY:**

1	✓	Assistance/Information Handout
2	✓	Used Oil Filter Study Summary/Used Oil Filters Management Information
3	✓	Copy of 40 CFR 261.(b)(13)
4	✓	Iowa Waste Reduction Center Pamphlet

I have read the above information, which was provided to the investigator. I certify that such information is true, accurate, and complete. I am aware that providing false information to the government is a criminal offense and that I can be fined and or imprisoned for doing so.

Printed Name Susan Lowrey

Signature Susan Lowrey

Date 9-1-98

**THERE IS NO CFC CHECKLIST INCLUDED IN THIS REPORT  
BECAUSE IT WAS NOT APPLICABLE**



**ATTACHMENT E**  
**OTHER SUPPORTING DOCUMENTS**

Date of Revision: 07-09-98  
Supersedes: 05-06-92  
Page 1 of 2, USED OIL

**MATERIAL SAFETY DATA SHEET**

\*\*\*\*\*  
Jebro Inc., 2303 Bridgeport Dr., Sioux City, IA 51111

EMERGENCY PHONE: Chemtrec 1 800 424-9300  
\*\*\*\*\*

**SECTION A:**

Product Name:  
Chemical Name:

**PRODUCT IDENTITY**

**SPECIFICATION USED OIL**  
Oils, used engine

**SECTION B:**

Specific Gravity:  
Solubility in Water:  
Appearance and Odor:

**PHYSICAL AND CHEMICAL CHARACTERISTICS**

0.87-0.89  
Negligible  
Dark brown liquid, characteristic motor oil odor

**SECTION C:**

Flash Point:

Flammability Limits:  
Extinguishing Media:  
NFPA Hazard Rating:

**FIRE, EXPLOSION AND REACTIVITY DATA**

Pensky-Martins Closed Cup: 170-210°F  
Cleveland Open Cup: 300°F minimum  
Lower: N/A, Upper: N/A  
Dry chemical or foam  
Health: 1, Fire: 2, Reactivity: 0  
WARNING: Combustible liquid. Keep away from ignition sources. Use with adequate ventilation.  
Hazardous Polymerization: Will not occur  
Hazardous Decomposition Products: Incomplete combustion may produce carbon monoxide  
Stability: Stable

**SECTION D:**

Symptoms of Exposure:  
Emergency Procedures:

**POTENTIAL HEALTH HAZARD & ENTRY ROUTES**

Headache, dizziness, nausea.

Eyes: Flush with clear water for 15 minutes. No significant irritation expected.

Skin: Prolonged or repeated contact can defat the skin and lead to irritation and/or dermatitis. Can be harmful on prolonged or repeated skin contact.

Inhalation: Avoid generation and inhalation of mists.

Ingestion: If ingested, induce vomiting. Get medical attention.

This product has a variable composition. It may contain component materials capable of producing skin cancer with varying degrees of potency in laboratory animals following frequent skin applications. This research has not been shown to have relevance to humans.

**SECTION E:****PRECAUTIONS AND PROTECTION**

Avoid skin contact. Wear gloves. Wear protective clothing, gloves and oil impervious footwear when contact is likely. Use of safety glasses is good industrial practice.

Page 2 of 2, USED OIL

**SECTION F:****SPILL OR LEAK PROCEDURES**

**Spill:** Recover free product. Add sand, clay, soil or other suitable absorbent to soak up material. Minimize skin contact. Keep spill from spreading into sewers or waterways by diking. Report spills onto navigable waterways to: National Response Center: 1 800 424-8802.

**Fire:** Asphalt cement will burn but is not readily ignitable.

**Emergency:** Phone: Chemtrec 1 800 424-9300

**SECTION G:****ADDITIONAL INFORMATION**

This MATERIAL SAFETY DATA SHEET and the information it contains is presented as accurate, complete and reliable to the best of Jebro Inc.'s knowledge and belief. Jebro Inc. does not warrant or guarantee this information and shall not be liable for any loss or damages arising out of the use thereof. It is the responsibility of each individual user to satisfy itself that the information presented in this document is suitable and complete for its particular use.

Prepared by: Jebro, Inc., 2303 Bridgeport Drive, Sioux City, IA 51111  
Phone 712 277-8955



DATE 8-31-78 TERMINAL NO. SCB  
CARRIER NO. 513 KITS 00  
WPG 745 HALOGENS/SNIFFER OK  
TERMS 24 TANK # 34

CUST. P.O. NO. \_\_\_\_\_

EPA I.D. NO IAD020201604

JS DOT NO. 245090

JS DOT HAZMAT REG. NO. 060598 007 019

**EMERGENCY TELEPHONE NO. 1-800-424-9300**

038704  
**MOTOR CARRIER BILL OF LADING**

Received, subject to tariffs and/or contract in effect on date of issuance hereof.

*Hawkins Const.*  
*2512 Dear Park*  
*Omaha, NE*

CUST. NO.: \_\_\_\_\_

CONSIGNEE TO OR SOLD TO: **JEBRO INC.**  
1-800-831-8037

SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
Gasoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	250	250				N/A
	Fuel Oil						
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
Other							
Other							

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

**GENERATOR'S REPRESENTATION**

The generator hereby warrants that the material released to the carrier is represented free of hazardous waste under RCRA. Misrepresentation of this material is the generator's legal and financial responsibility to correct damages.

SHIPPER N/A CARRIER [Signature]

"This shipment shall be governed by (A) the contract between shipper and carrier, if a contract carrier, or (B) the terms of the applicable bill of lading form described in the National Motor Freight Classification No. A9, MF-1 C, C-9, supplements thereto or reissues thereof, if carrier is a common carrier, provided that if this is an interstate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of applicable bill of lading."

Carrier certifies that the cargo tank supplied for this shipment is a proper container for this commodity as described by the shipper."

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER

DATE 8-31-98 TERMINAL NO. 51074  
CARRIER NO. 313 KITS 00  
VPG 745 HALOGENS/SNIFFER OK  
TERMS Net TANK # 344

CUST. P.O. NO. \_\_\_\_\_

EPA I.D. NO IAD020201604

JS DOT NO. 245090

US DOT HAZMAT REG. NO. 060598 007 019

**EMERGENCY TELEPHONE NO. 1-800-424-9300**

038700  
**MOTOR CARRIER BILL OF LADING**

Received, subject to tariffs and/or contract in effect on date of issuance hereof.

*Free Friendly Service*  
*2901 Leeward*  
*Omaha, NE*

CUST. NO.: \_\_\_\_\_

CONSIGNED TO OR SOLD TO: **JEBRO INC.**  
1-800-831-8037

SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
Gasoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	400	400				N/C
	Fuel Oil						
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
Other							
Other							

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

**GENERATOR'S REPRESENTATION**

The generator hereby warrants that the material released to the carrier is represented free of hazardous waste under RCRA. Misrepresentation of this material is the generator's legal and financial responsibility to correct damages.

SHIPPER \_\_\_\_\_ CARRIER Porter

"This shipment shall be governed by (A) the contract between shipper and carrier, if a contract carrier, or (B) the terms of the applicable bill of lading form described in the National Motor Freight Classification No. A9, MF-1 C. C.-9, supplements thereto or reissues thereof, if carrier is a common carrier, provided that if this is an interstate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of applicable bill of lading."

Carrier certifies that the cargo tank supplied for this shipment is a proper container for this commodity as described by the shipper."

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER



# MOTOR CARRIER BILL OF LADING ORIGINAL

This shipment shall be governed by (a) the contract between shipper and carrier, if carrier is a contract carrier; or (b) the terms of applicable bill of lading form described in National Motor Freight Classification No. A3 MF-1, C.C. No. 8 issued by F. G. Freund, Agent, supplements thereto or reissues thereof, if carrier is a common carrier, provided that, if this is an intrastate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of the applicable bill of lading.

**INVOICE TO:**

**Brower Construction Co**  
**P.O. Box 1137**  
**Sioux City, IA 51102**

**DESTINATION:**

**Deliver to the Central Sand & Gravel Pit located**  
**approximately 6 miles north and 2 miles east of**  
**Ashland, NE.**

**MILEAGE: 102**  
**DELIVERY TIME: 19:00**  
**DELIVERY DATE: 09/01/98**

**PROJECT NUMBER: Saunders, Co. - (Yutan)**

**CONTRACT NUMBER: 988074**  
**PURCHASE ORDER #:**

**CONSIGNEE: Jebro Incorporated**  
**FREIGHT TYPE: Prepaid**  
**TIME IN: 9/1/98 14:00**  
**TIME OUT: 9/1/98 14:49**  
**CARRIER: Michael C. Harms**  
**UNIT NUMBERS: MHarms98 /Jeb204**

Carrier certifies that the cargo tank supplied for this shipment is a proper container for transportation of this commodity as described by this shipper and that proper placards have been applied.

I hereby certify that the maximum legal weight for the vehicle transporting the

goods described above is: 20000

**DRIVER**

**Arrival Time:**

**Unloading Began**

**CUSTOMERX**

**Unloading Complete:**

**Pump Used or Ordered**

**Reason for Delay**

**Customer Signature**

**PRODUCT INFORMATION**

**Combustible Liquid, n.o.s., NA 1993, PG III**

**Chemtec: 1-800-424-9300**

**Jebro: 1-800-831-8037**

**Burner Fuel**

**SP.G.: 0.8870**

**lb/gal: 7.3860**

**Temp 174 F; 79**

**kg/lt: 0.8850**

**Temp adj 0.95553**

**EMERGENCY CONTACT: 1-712-277-8855**

**LOAD WEIGHTS AND QUANTITIES**

<b>Gross Lbs</b>	<b>76,500</b>	<b>( 34,700 kg )</b>
<b>Tare Lbs</b>	<b>29,860</b>	<b>( 13,544 kg )</b>
<b>Net Lbs</b>	<b>46,640</b>	<b>( 21,156 kg )</b>

**Net Tons 23.32 ( 21.16 Mg )**

**Net Gallons @60F 6,315 ( 23,905 l )**

**Project# STPE-3425(3)**

This is to certify that the above named articles are properly described, and are packed and marked and are in proper condition for transportation according to the regulations by the Interstate Commerce Commission.

**TEMPERATURE FOR KINEMATIC VISCOSITY OF:**

<b>300 Cs =</b>	<b>0</b>
<b>150 Cs =</b>	<b>0</b>
<b>200 Cs =</b>	<b>0</b>
<b>50 Cs =</b>	<b>0</b>

**SEAL NUMBERS:**

**CERTIFICATE OF COMPLIANCE**

I certify that the asphalt material shipped on this bill of lading complies with Department of Transportation specifications for the state of **Nebraska**

The transport tank was examined and found suitable for loading.

**SHIPPER: JEBRO INC.**

**SUPPLIER AUTHORIZED REP. & WEIGHER**

**Need: \*\*Pump\*\***

**Terminal: Sioux City, IA**  
**Bill of Lading Number:**

**22423**

**OFFICE COPY**



# Midwest Laboratories, Inc.

Report Number  
98-225-2074

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

## REPORT OF ANALYSIS

For: ( 7691) JEBRO INC  
(712)277-8855

Date Reported: 08/13/98

Date Received: 08/04/98

### Mail to:

JEBRO INC  
2303 BRIDGEPORT DRIVE  
SIOUX CITY IA 51111-1001

PO/Proj. #: 2596  
TANK 20

Lab number: 412909      Sample ID: ID #83

Analysis	Level Found	Units	Detection Limit	Method	Analyst-Date
Total halogens	0.05	%	0.02	ASTM D1317-118	jjd-08/05
Arsenic (dissolved)	n.d.	mg/kg	5.0	EPA 6010	pmd-08/13
Cadmium (dissolved)	1.28	mg/kg	0.05	EPA 6010	pmd-08/13
Lead (dissolved)	24.4	mg/kg	0.5	EPA 6010	pmd-08/13
Chromium (dissolved)	1.6	mg/kg	0.1	EPA 6010	pmd-08/13
Ignitability	218	deg F	39	ASTM D93	jjd-08/07

### Notes:

n.d. - Not Detected.

Respectfully Submitted

  
Heather Ramig  
Client Services

7.387  
6.8  
380

*The above analytical results apply only to the sample(s) submitted.*

Our reports and letters are for the exclusive and confidential use of our clients and may not be reproduced in whole or in part, nor may any reference be made to the work, the results, or the company in any advertising, news release, or other public announcements without obtaining our prior written authorization.



Report Number  
98-210-2024

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

### REPORT OF ANALYSIS

For: ( 7691) JEBRO INC  
(712)277-8855

Date Reported: 07/29/98

Date Received: 07/08/98

**Mail to:**

JEBRO INC  
2303 BRIDGEPORT DRIVE  
SIOUX CITY IA 51111-1001

PO/Proj. #: 2567  
TANK 20

Lab number: 408025      Sample ID: ID # 82

Analysis	Level Found	Units	Detection Limit	Method	Analyst-Date
Total halogens	0.04	%	0.01	ASTM D1317-118	jjd-07/10
Arsenic (dissolved)	n.d.	mg/kg	5.0	EPA 6010	pmd-07/28
Cadmium (dissolved)	0.85	mg/kg	0.05	EPA 6010	pmd-07/28
Lead (dissolved)	27.3	mg/kg	0.5	EPA 6010	pmd-07/28
Chromium (dissolved)	1.6	mg/kg	0.1	EPA 6010	pmd-07/28
Ignitability	183	deg F	39	ASTM D93	jjd-07/15

**Notes:**

n.d. - Not Detected.

Sample was prepared for metals analysis by EPA method 3040 .

Respectfully Submitted

Heather Ramig  
Client Services

7. 375  
4. 670  
385

*The above analytical results apply only to the sample(s) submitted.*

Our reports and letters are for the exclusive and confidential use of our clients and may not be reproduced in whole or in part, nor may any reference be made to the work, the results, or the company in any advertising, news release, or other public announcements without obtaining our prior written authorization.

# Midwest Laboratories, Inc.

Report Number  
96-114-2036

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

## REPORT OF ANALYSIS

For: ( 7691) JEBRO INC  
(712)277-8855

Date Reported: 04/23/96

Date Received: 04/18/96

### Mail to:

JEBRO INC  
2303 BRIDGEPORT DRIVE  
SIOUX CITY IA 51111-1001

PO/Proj. #: 436139

USED OIL SLUDGE ANALYSIS - STRAINER

Lab number: 295669

Sample ID: TANK 38 ID # TCLP

Analysis	Level Found	Units	Detection Limit	Method	Analyst-Date
Arsenic (TCLP)	n.d.	mg/L	0.5	EPA 6010	acc-04/23
Barium (TCLP)	0.75	mg/L	0.005	EPA 6010	acc-04/23
Mercury (TCLP)	n.d.	mg/L	0.0002	EPA 7470	acc-04/23
Selenium (TCLP)	n.d.	mg/L	0.10	EPA 6010	acc-04/23
Silver (TCLP)	n.d.	mg/L	0.01	EPA 6010	acc-04/23
Chromium (TCLP)	0.04	mg/L	0.01	EPA 6010	acc-04/23
Lead (TCLP)	0.05	mg/L	0.05	EPA 6010	acc-04/23
Cadmium (TCLP)	0.01	mg/L	0.005	EPA 6010	acc-04/23
Nickel (TCLP)	0.03	mg/L	0.01	EPA 6010	acc-04/23
Copper (TCLP)	0.03	mg/L	0.01	EPA 6010	acc-04/23
Zinc (TCLP)	35.0	mg/L	0.01	EPA 6010	acc-04/23

### Notes:

n.d. - Not Detected.

Respectfully Submitted

*Heather Ramig*  
Heather Ramig/Lisa Dworak  
Client Services

*The above analytical results apply only to the sample(s) submitted.*

Our reports and letters are for the exclusive and confidential use of our clients and may not be reproduced in whole or in part, nor may any reference be made to the work, the results, or the company in any advertising, news release, or other public announcements without obtaining our prior written authorization.



Dike Volumes at Jebro Inc.

From: Michael Marlow  
Sent: Friday, September 04, 1998 9:33 AM  
To: 'homerd@ttemi.com'  
Cc: Susan Lowery  
Subject: Dike Volumes at Jebro, Inc.

David,

I am listing the dike volumes and corresponding tank capacities that are in each dike area to help complete your inspection.

Tank Number	Tank Storage Capacity
Dike Volume	
T20	83000 gals
	4,193,288 gals
300 series tanks	100000 gals
	492,446 gals
T18 & T29 (poly area)	17900 gals
	1,012,.672 gals
T5	1,000,000 gals
	2,320,633 gals

We have determined that the clay base in our containment areas is 24 inches in depth.

Please call or E mail us if we can be of further assistance.

Sincerely, Mike

**ATTACHMENT F**  
**RCRIS HANDLER INFORMATION REPORT**

## RCRIS HANDLER INFORMATION REPORT

July 23, 1998

The information summarized below has been entered into EPA's RCRA Computer Data Base for the INSTALLATION LOCATION AND EPA RCRA Identification Number listed. If any of this information is inaccurate, you may notify us of the change(s) by writing to us, telephoning us, or by completing a Notification of Regulated Waste Activity Form (EPA Form 8700-12), a copy of which is attached, or simply marking any changes on this report and sending it to EPA at:

EPA REGION 7 - ARTD/RESP  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

Your cooperation in helping us to maintain accurate records is appreciated. If you have any questions, please call our Iowa RCRA Hazardous Waste Inquiry Helpline number (913) 551-7861, and leave a message. Someone will get back to you as soon as possible.

EPA RCRA ID Number: IAD020201604

Name of Company/Installation: JEBRO INC  
Location of Installation: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111  
County: WOODBURY

Mailing Address: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111

Installation Contact: SUSAN LOWREY  
Job Title: SAFETY SUPVR  
Phone Number: (712) 277-8855  
Contact's Address: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111

Current Owner of Installation: JEBRO INC  
Owner's Address: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111  
Phone Number: (712) 277-8855

Land Type: Private  
Owner Type: Private

TYPE(S) OF REGULATED ACTIVITY: USED OIL FUEL MARKETER  
USED OIL TRANSPORTER  
USED OIL TRANSPORTER - TRANSFER FACILITY

Hazardous Wastes Handled: UOIL

E 10/08/96 \* N 10/08/96 \*

SIGNATURE

*Susan Lowrey*

Susan Lowrey  
Safety - Human Resource  
Supervisor

NAME & OFFICIAL TITLE

DATE SIGNED

9-1-98

All information you submit in a notification can be released to the public, according to the Freedom of Information Act, unless it is determined to be confidential by U.S. EPA pursuant to 40 CFR Part 2. Since notification information is very general, the U.S. EPA believes it is unlikely that any information in your notification could qualify to be protected from release. However, you may make a claim of confidentiality by printing the word "CONFIDENTIAL" on both sides of the Notification Form and on any attachments or submittals including this information report. EPA will take action on the confidentiality claims in accordance with 40 CFR Part 2.



**IOWA USED OIL INSPECTION  
JEBRO INC.  
IAD020201604  
2303 BRIDGEPORT DRIVE  
SIOUX CITY, IOWA 51111**

**Prepared for:**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region 7  
Kansas City, Kansas 66101**

Work Assignment Number	: R07047
EPA Region	: 7
Date Inspected	: September 1, 1998
Date Prepared	: December 11, 1998
Contract Number	: 68-W4-0004
EPA Work Assignment Manager	: Alma Moreno Lahm
Telephone Number	: (913) 551-5232
Prepared By	: Tetra Tech EM Inc.
Tetra Tech Project Manager	: Andrew Mazzeo
Telephone Number	: (913) 495-3940

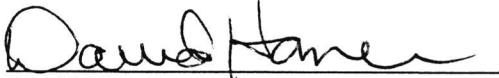
**SUMMARY OF RCRA USED OIL INSPECTION**  
**JEBRO, INC.**  
**2303 BRIDGEPORT DRIVE**  
**SIOUX CITY, IOWA 51111**  
**IAD020201604**

**Inspection Participants:** Mr. David Homer, Tetra Tech EM Inc.  
Ms. Lisa Wilson, Tetra Tech EM Inc.  
Mr. Michael K. Marlow, General Manager, Jebro Inc.  
Ms. Susan Lowery, Safety Supervisor, Jebro Inc.

**Inspection Date:** September 1, 1998

**List of Attachments:** Attachment A -- Confidential Business Information Forms  
Attachment B -- Notice of Preliminary Findings  
Attachment C -- Photographic Log  
Attachment D -- Inspection Checklists  
Attachment E -- Other Supporting Documents  
Attachment F -- RCRIS Handler Information Report

**Submitted By:**

  
David Homer  
Environmental Toxicologist

The Tetra Tech inspection team inspected the Jebro Inc. (Jebro) facility on September 1, 1998, as a used oil transporter, transfer facility, processor, and fuel marketer. The team used the used oil inspection form (Attachment D) as a basis for the inspection. The form, however, does not cover the complete requirements for a used oil transporter, processor, and fuel marketer. The purpose of this summary is to provide additional information on Jebro's activities as a transporter, processor, and fuel marketer, and should be viewed as a supplement to the used oil inspection form.

The inspection began at 13:00 with introductions and I explained the purpose of the inspection and the authority to conduct this inspection. I reviewed the facilities right to claim information as business confidential, during the inspection information was claimed as business confidential by Mr. Michael Marlow, General Manager. The information claimed as confidential is the data on the number of tanks at the facility, their capacity, and any pictures of the facility. The inspection consisted of a review of the activities at the site, a site tour, and a review of relevant electronic records and other documents.

Mr. Marlow stated that Jebro's main operation is liquid asphalt manufacturing. He stated that used oil is used in various portions of the asphalt manufacturing process; it is blended with heavier asphalt to make a lighter product, used as fuel at the plant, and sold as a fuel to asphalt batch plants.

Mr. Marlow stated Jebro, as a transporter, collects used oil from over 800 locations in Iowa, Nebraska, and South Dakota. Since Jebro is a transporter, they are subject to the requirements of 40 Code of Federal Regulations (CFR) 279 Subpart E. To meet these requirements, Jebro submitted a notification of hazardous waste activity form to the Environmental Protection Agency (EPA) on October 8, 1996 and received an EPA hazardous waste ID No. IAD020201604. Mr. Marlow explained that all used oil is transported to its facility in Sioux City, Iowa. Jebro has established procedures the drivers must follow

when accepting used oil for shipment to its facility. These procedures, as described by Mr. Marlow, are presented in the following paragraph.

The Jebro drivers are responsible for evaluating the used oil at pick up. They use their knowledge of clients' processes and an electronic sniffer to check for light end products. If the used oil fails the sniffer test, then the driver uses a chlortest kit to check for halogens. If the used oil fails this test, it is not picked up, and the driver leaves the bill of lading, unless the client provides a full chemical analysis to verify that the used oil is lower than the 1,000 parts per million (ppm) halogen limit. This procedure is meant to ensure compliance with 40 CFR 279.44. Mr. Marlow stated that Jebro keeps a hard copy of the bill of lading for each shipment for at least 3 years. Jebro maintains an electronic data base of the information from the bills of lading that date back to 1989. I reviewed a number of these bills of lading and found them in compliance with 40 CFR 279.46. The bills of lading identify the date of shipment, the generator of the used oil, and the volume of used oil accepted. During the inspection I did not observe any bills of lading that had a full chemical analysis attached supporting its compliance with the 1,000 ppm halogen limit. Mr. Marlow stated that it is very rare that supporting documentation would be provided.

Mr. Marlow explained once the used oil arrives at the facility it is unloaded into the 300 series tanks. There are 4 tanks in this series and the capacity of each tank is given below.

Tank No. 343	21,000 gallons
Tank No. 344	17,000 gallons
Tank No. 347	20,000 gallons
Tank No. 348	17,000 gallons

Mr. Marlow stated that all these tanks are connected via piping and pumps to allow for oil to be moved between the various tanks as needed. The oil from the 300 series tanks is pumped to Tank No. 20 the main supply tank and kept at 160 °F in order for the oil to be atomized in burners. Once a month, the content of this tank is sampled to determine whether the used oil meets specifications (40 CFR 279.11). Midwest Laboratory, Omaha, Nebraska, performs the analytical tests on the oil. The oil from Tank No. 20 is either piped to on-site boilers or to racks for shipment off site for use in asphalt batch plants. Jebro maintains a computer data base that tracks each off-site shipment of used oil. I reviewed the data base and found that it contains the following information on each shipment of used oil- date of shipment, destination of the shipment, volume of used oil shipped, and an analysis certification number. Mr. Marlow stated that each analysis is given a certification number and Jebro assigns the appropriate analysis certification number for each used oil shipment. The data base cross references the used oil shipments to the monthly analysis of used oil from Tank No. 20 by certification number. Mr. Marlow stated that oil from Tank No. 20 is also pumped to Tanks No. 15, 18, and 29 for on-site storage prior to burning in heaters or boilers. Tank No. 18 is the supply tank for hot oil heater in the "poly area."

Jebro acts as a used oil processor through its blending of used oil with asphalt to obtain the necessary job specifications. As noted earlier, Jebro has notified as a processor. Jebro is required to meet the general facility standards, 40 CFR 279.52. I reviewed the operation plan for the facility and observed the operation during the visual inspection of the facility. I found that the facility was operated and maintained in a manner to minimize releases and explosions as required in 40 CFR 279.52(a)(1). During the visual inspection I observed that the facility had the specific equipment and communications devices required in 40 CFR 279.52(a)(2)(3) and (4). No deficiencies were noted during the inspection.



During the visual inspection, I observed that there was adequate space between all tanks on site to meet the requirements of 40 CFR 279.52(a)(5). Mr. Marlow stated that the facility is inspected by the fire department at least once a year. During the inspection the fire department is briefed on materials handled, layout of the facility, and evacuation routes as required in 40 CFR 279.52(a)(6).

I reviewed the facility's contingency plan for compliance with 40 CFR 279.52(b) and no deficiencies were noted.

40 CFR 279.53 requires that Jebro provide information on the halogen content of the used oil. As explained earlier, Mr. Marlow stated Jebro samples Tank No. 20 once per month to ensure that the used oil meets the specifications. I reviewed the electronic data base and several analytical reports and did not identify any halogen concentrations greater than 1,000 ppm, confirming that the used oil is not a hazardous waste.

Used oil management requirements are outlined in 40 CFR 279.54. Mr. Marlow stated that Jebro stores all used oil in tanks at its facility, no containers are used and that all tanks are located in areas with secondary containment. I confirmed this information during the visual site inspection. Tetra Tech received a follow-up e-mail from Jebro on September 4, 1998 providing information on the volumes of the tanks and of the secondary containment areas for each tank (Attachment E). The message also stated that all secondary containment areas were constructed with 2 feet of compacted clay. I reviewed this information and found no deficiencies with the requirements.

As part of the inspection, I reviewed the site analysis plan, tracking system, and operating record. No deficiencies were noted with the requirements in 40 CFR 279.55, 279.56, 279.57, 279.58, and 279.59.

Jebro notified EPA that it acts as a used oil fuel marketer. Mr. Marlow stated that Jebro sells used oil as a fuel to be used in batch asphalt plants. Jebro, as described earlier, maintains an electronic database which tracks all off-site shipments of used oil and the associated certification number corresponding to appropriate the laboratory analysis performed on a sample from Tank 20, the supply tank. Mr. Marlow stated that Jebro does not provide a certification of oil quality with each shipment, although Jebro markets the oil as specification used oil. According to 40 CFR 279.61(a)(1) facilities that meet the definition of an industrial furnace are allowed to burn off-specification used oil. Mr. Marlow stated that the batch asphalt plants meet the definition of industrial furnace and the batch plants are able to accept and burn off-specification oil.

Subsequent to the inspection, Tetra Tech requested a material safety data sheet (MSDS) on the used oil that is sold for off-site use. Mr. Marlow faxed a copy of the MSDS (see Attachment E) to Tetra Tech on October 13, 1998, stating that the oil is marketed as "specification used oil."

I reviewed Jebro's notification form and shipment tracking data base for the used marketer requirements, 40 CFR 279.7 Subpart H. No deficiencies were noted during the inspection.

The inspection also included the completion of the used oil inspection form. It should be noted that the form requests the name and address of all facilities that use Jebro as a transporter of used oil. Mr. Marlow stated that this information is considered business confidential, and Jebro would supply the information directly to EPA, if requested in writing.

The inspection concluded with a discussion of the notice of preliminary findings of the inspection (see Attachment 2). The only violation noted was that Tank No. 343 was not labeled with the words "used oil" as required by 40 CFR 279.54(f). A global positioning reading was taken at the facility and the inspection concluded at 1500.

**ATTACHMENT A**  
**CONFIDENTIAL BUSINESS INFORMATION FORMS**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

1AD020201604

Facility Name <i>Tebro Inc.</i>	
Facility Address <i>2303 Bridgeport Dr. , Sioux City, IA. 51111</i>	
Inspector (print) <i>David Homer</i>	
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115 <i>Tetra Tech Env Inc.</i>	Date <i>6/1/98</i>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date
<i>Susan Lowrey</i>	<i>Susan Lowrey</i> 9-1-98

Information for which confidential treatment is requested:

- A) Tank information - capacities, volumes, storage, products
- B) Facility photos

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

1AD0202416904

Facility Name <u>Lebro Inc.</u>
Facility Address <u>2303 Bridgeport Dr. , Sioux City, IA. 51111</u>

Documents Collected? YES\_\_\_ (list below) NO\_\_\_

Samples Collected? YES\_\_\_ (list below) NO\_\_\_ Split Samples: YES\_\_\_ NO\_\_\_

Documents/Samples were: 1)Received no charge\_\_\_ 2)Borrowed\_\_\_ 3)Purchased\_\_\_

Amount Paid: \$\_\_\_ Method: Cash\_\_\_ Voucher\_\_\_ To Be Billed\_\_\_

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- =====
- Photos (2) - front of facility (sign and tanks)  
tank #342 missing "used oil" placard
- (2) Bill of Lading #15 038700 and 038704 (pickups) from Hawkins Construction & Fred's Freight, Inc.
- (1) Bill of Lading # 22423 to Brewer Construction (delivery)
- (2) Report & Analysis of Tank #20 from Mid West Laboratories, Inc. (98-210-2024 and 98-225-2074)
- (1) Report & Analysis of used oil sludge (obtained) from Mid West Laboratories, Inc. (98-104-2036)

Facility Representative (print) <u>Susan Laorey</u>	Signature/Date <u>Susan Laorey</u> <u>9-1-98</u>
Inspector (print) <u>David H Homer</u>	Signature/Date <u>David H Homer</u> <u>9/1/98</u>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	

**ATTACHMENT B**  
**NOTICE OF PRELIMINARY FINDINGS**



NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Tebro Inc.  
ADDRESS: 2703 Bridgeport Drive  
Sioux City, IA 51111  
EPA ID NUMBER: AD020201004 DATE: 09/01/98

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failure to label used oil tank # 343 with the words "used oil"  
40 CFR 279.22(c)
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_

If you have any questions regarding these findings please contact

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Susan Lowrey TITLE: Safety and Human Resource Supervisor  
SIGNATURE: Susan Lowrey 9-1-98

This document was prepared by David Hower

**ATTACHMENT C**  
**PHOTOGRAPHIC LOG**

**JEBRO, INC.**  
**Sioux City, Iowa**



Photo No: 1 Direction Facing: Northwest Photographer: Lisa K. Wilson  
Date: 09/01/98, 1410 Description: Used oil tank #343 with "used oil" placard missing.



Photo No: 2 Direction Facing: Northwest Photographer: Lisa K. Wilson  
Date: 09/01/98, 1446 Description: Sign and tanks as viewed from entrance of parking lot on Bridgeport; silver tank #5 is used oil, the rest are asphalt.

**ATTACHMENT D**  
**INSPECTION CHECKLISTS**





## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

## USED OIL INSPECTION FORM

Company Name	Jebro Inc.	EPA Identification Number	IAD 0202016804
Address & Zip	2303 Bridgeport Dr. Sioux City, IA - 51111	Telephone Number	712-277-8855
		Fax Number	712-277-8451
Company Contact	Susan Lowrey Michael K. Markovitz <del>DA</del>	Title Safety Supervisor. General Manager Petroleum Recovery	
Investigator	David Homer	Investigation Date	09/01/98
At This Location Since	1972		
Number Of Employees	36		
Facility Size	32.5 acres		
Business Type	liquid asphalt manufacturing		
Used Oil Management Activities	Pickup used oil, transport, storage, burned		
1	Describe How Used Oil Filters Are Generated	as fuel, blending agent, and sales to portable asphalt plants	
	none		
2	Used Oil Filter Generation Rate		
	not generated		

3	Describe How Used Oil Filters Are Drained & Managed On-site (Obtain Photographic Documentation)
	not applicable
4	How & Where Are Used Oil Filters Disposed Of? (Obtain Written Documentation)
	not applicable
5	Amount of Used Oil Filters On-site
	not applicable
6	List the Processes That Generate Used Oil
	no generation
7	Describe How the Used Oil Generated from Each Process Is Managed On-site
	no generation
8	Used Oil Generation Rate
	not generated

9	State the Number and Size of Used Oil Storage Containers and Tanks On-site & the Amount of Used Oil in Each Tank and Container	Current level
	Tank 5 1000,000 gallon capacity	515,928 gallons
	18 7,900 gallon	5,232 gallons
	20 83,000 gallons	52,272 gallons
	29 8,000 gallons	3,562 gallons
	343 21,000 gallons	4,142 gallons
	344 17,000 gallons	14,263 gallons
	348 17,000 gallons	2,803 gallons
	347 20,000 gallons	— empty
10	State How Each Tank and Container Containing Used Oil Is Labeled	
	343 not labeled with "used oil" all other tanks had proper labeling	
11	For Each Tank and Container Containing Used Oil That Is Not in Good Condition, Describe the Condition of the Container /Tank (Obtain Photographic Documentation)	
	all tanks in good condition	
11a	Describe Any Secondary Containment (Obtain Photographic Documentation)	
	Has secondary containment for all tanks, bermed with earthen dikes.	

12 Describe Any Used Oil Spills or Staining Found On-site (Obtain Photographic Documentation)

no spills found at the site.

13 Describe Used Oil/hazardous Waste Mixing Activities

no mixing of hazardous waste on-site.

14 Is used oil burned in on-site space heater?

If So State How Much Used Oil Is Burned per Year, the Design Capacity of the Space Heater,  
and If the Heater Combustion Gases Are Vented to the Outside

no space heaters on-site.



15	State Name, Address, Telephone Number, & EPA Identification Number of the Transporter That Picks up the Used Oil (Obtain Written Documentation)	
Company Name <i>All transportation is self transporting</i>		EPA Identification Number
Address		Telephone Number
& Zip		
Company Name		EPA Identification Number
Address		Telephone Number
& Zip		
16	If used oil is collected under a tolling arrangement, obtain a copy of the agreement/contract.	
	<i>Not applicable</i>	
17	Describe generator used oil self- transportation activities	
	<i>no self transportation - facility is a transporter of used oil. Picks up from generators and delivers oil to hatch <del>pet</del> plants.</i>	
18	State the amount of used oil collected from do-it-yourselfers per month	
	<i>no collection from do-it-yourselfers</i>	

19	State the amount of used oil collected from businesses per month		
	200,000 gallons / month approx.		
20	If Used Oil Is Collected from Other Businesses. Obtain a Copy of the Registration/ Permit/ License/ Authorization from the State / County/ Municipal Government That Allows the Company to Run a Used Oil Collection Center.		
	Has notified EPA as a used oil generator, fuel marketer, and transfer facility.		
	If No Such Documentation Is Available. Please State Such:		
21	If Used Oil Is Collected from Other Businesses. Are Shipments of Greater than 55 Gallons Accepted?		
	Yes.		
	If So State the Following for Each Such Business: 800 customers, if EPA wants the list, will have it requested in writing with a letter from EPA.		
	Business Name	Telephone #	
	Address & Zip	Contact Name	
	Name	Telephone #	
	Address & Zip	Contact Name	
	Name	Telephone #	
	Address & Zip	Contact Name	
	Name	Telephone #	
	Address & Zip	Contact Name	



**LIST OF HANDOUTS PROVIDED TO THE FACILITY:**

- |   |   |   |
|---|---|---|
| 1 | ✓ | Assistance/Information Handout  |
| 2 | ✓ | Used Oil Filter Study Summary/Used Oil Filters Management Information |
| 3 | ✓ | Copy of 40 CFR 261.(b)(13)  |
| 4 | ✓ | Iowa Waste Reduction Center Pamphlet                                  |
|   |   |   |
|   |   |   |
|   |   |   |
|   |   |   |
|   |   |   |

I have read the above information, which was provided to the investigator. I certify that such information is true, accurate, and complete. I am aware that providing false information to the government is a criminal offense and that I can be fined and or imprisoned for doing so.

Printed Name Susan Lowrey

Signature *Susan Lowrey*

Date 9-1-98



**THERE IS NO CFC CHECKLIST INCLUDED IN THIS REPORT  
BECAUSE IT WAS NOT APPLICABLE**

**ATTACHMENT E**  
**OTHER SUPPORTING DOCUMENTS**

Date of Revision: 07-09-96  
Supersedes: 05-06-92  
Page 1 of 2, USED OIL

**MATERIAL SAFETY DATA SHEET**

Jebro Inc., 2303 Bridgeport Dr., Sioux City, IA 51111  
EMERGENCY PHONE: Chemtrec 1 800 424-9300

**SECTION A:**

Product Name:  
Chemical Name:

**PRODUCT IDENTITY**

**SPECIFICATION USED OIL**  
Oils, used engine

**SECTION B:**

Specific Gravity:  
Solubility in Water:  
Appearance and Odor:

**PHYSICAL AND CHEMICAL CHARACTERISTICS**

0.87-0.89  
Negligible  
Dark brown liquid, characteristic motor oil odor

**SECTION C:**

Flash Point:

Flammability Limits:  
Extinguishing Media:  
NFPA Hazard Ratings:

**FIRE, EXPLOSION AND REACTIVITY DATA**

Pensky-Martins Closed Cup: 170-210°F  
Cleveland Open Cup: 300°F minimum  
Lower: N/A, Upper: N/A  
Dry chemical or foam  
Health: 1, Fire: 2, Reactivity: 0  
WARNING: Combustible liquid. Keep away from ignition sources. Use with adequate ventilation.  
Will not occur  
Incomplete combustion may produce carbon monoxide  
Stable

Hazardous Polymerization:  
Hazardous Decomposition Products:  
Stability:

**SECTION D:**

Symptoms of Exposure:  
Emergency Procedures:

**POTENTIAL HEALTH HAZARD & ENTRY ROUTES**

Headache, dizziness, nausea.

Eyes: Flush with clear water for 15 minutes. No significant irritation expected.

Skin: Prolonged or repeated contact can defat the skin and lead to irritation and/or dermatitis. Can be harmful on prolonged or repeated skin contact.

Inhalation: Avoid generation and inhalation of mists.

Ingestion: If ingested, induce vomiting. Get medical attention.

This product has a variable composition. It may contain component materials capable of producing skin cancer with varying degrees of potency in laboratory animals following frequent skin applications. This research has not been shown to have relevance to humans.

**SECTION E:****PRECAUTIONS AND PROTECTION**

Avoid skin contact. Wear gloves. Wear protective clothing, gloves and oil impervious footwear when contact is likely. Use of safety glasses is good industrial practice.

Page 2 of 2, USED OIL

**SECTION F:****SPILL OR LEAK PROCEDURES**

**Spill:** Recover free product. Add sand, clay, soil or other suitable absorbent to soak up material. Minimize skin contact. Keep spill from spreading into sewers or waterways by diking. Report spills onto navigable waterways to: National Response Center: 1 800 424-9802.

**Fire:** Asphalt cement will burn but is not readily ignitable.

**Emergency:** Phone: Chemtrec 1 800 424-9300

**SECTION G:****ADDITIONAL INFORMATION**

This MATERIAL SAFETY DATA SHEET and the information it contains is presented as accurate, complete and reliable to the best of Jebro Inc.'s knowledge and belief. Jebro Inc. does not warrant or guarantee this information and shall not be liable for any loss or damages arising out of the use thereof. It is the responsibility of each individual user to satisfy itself that the information presented in this document is suitable and complete for its particular use.

Prepared by: Jebro, Inc., 2303 Bridgeport Drive, Sioux City, IA 51111  
Phone 712 277-8855



DATE 8-31-78 TERMINAL NO. S. City  
CARRIER NO. 53 KITS 05  
WPG 745 HALOGENS/SNIFFER OK  
TERMS 24 TANK # 34

CUST. P.O. NO. \_\_\_\_\_

EPA I.D. NO IAD020201604

US DOT NO. 245090

US DOT HAZMAT REG. NO. 060598 007 019

**EMERGENCY TELEPHONE NO. 1-800-424-9300**

038704  
**MOTOR CARRIER BILL OF LADING**

Received, subject to tariffs and/or contract in effect on date of issuance hereof.

*Haskins Const.  
2512 New Park  
Omaha, NE*

CUST. NO.: \_\_\_\_\_

CONSIGNED TO OR SOLD TO: **JEBRO INC.**  
1-800-831-8037

SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
Gasoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	<u>250</u>	<u>250</u>				<u>N/A</u>
	Fuel Oil						
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
Other							
Other							

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

**GENERATOR'S REPRESENTATION**

The generator hereby warrants that the material released to the carrier is represented free of hazardous waste under RCRA. Misrepresentation of this material is the generator's legal and financial responsibility to correct damages.

SHIPPER N/A CARRIER [Signature]

"This shipment shall be governed by (A) the contract between shipper and carrier, if a contract carrier, or (B) the terms of the applicable bill of lading form described in the National Motor Freight Classification No. A9, MF-1 C, C-9, supplements thereto or reissues thereof, if carrier is a common carrier, provided that if this is an interstate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of applicable bill of lading."

Carrier certifies that the cargo tank supplied for this shipment is a proper container for this commodity as described by the shipper."

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER

DATE 8-31-98 TERMINAL NO. 5074  
CARRIER NO. 313 KITS 00  
WPG 745 HALOGENS/SNIFFER OK  
TERMS Net TANK # 347

CUST. P.O. NO. \_\_\_\_\_

EPA I.D. NO IAD020201604

US DOT NO. 245090

US DOT HAZMAT REG. NO. 060598 007 019

**EMERGENCY TELEPHONE NO. 1-800-424-9300**

038700  
**MOTOR CARRIER BILL OF LADING**

Received, subject to tariffs and/or contract in effect on date of issuance hereof.

*Free Friendly Service*  
*2001 September 4*  
*Amelia 15*

CUST. NO.: \_\_\_\_\_

CONSIGNED TO OR SOLD TO: **JEBRO INC.**  
1-800-831-8037

SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
Gasoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	400	400				N/C
	Fuel Oil						
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
Other							
Other							

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

**GENERATOR'S REPRESENTATION**

The generator hereby warrants that the material released to the carrier is represented free of hazardous waste under RCRA. Misrepresentation of this material is the generator's legal and financial responsibility to correct damages.

SHIPPER \_\_\_\_\_ CARRIER *Redline*

"This shipment shall be governed by (A) the contract between shipper and carrier, if a contract carrier, or (B) the terms of the applicable bill of lading form described in the National Motor Freight Classification No. A9, MF-1 C. C.-9, supplements thereto or reissues thereof, if carrier is a common carrier, provided that if this is an interstate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of applicable bill of lading."

Carrier certifies that the cargo tank supplied for this shipment is a proper container for this commodity as described by the shipper."

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER



# MOTOR CARRIER BILL OF LADING ORIGINAL

This shipment shall be governed by (a) the contract between shipper and carrier, if carrier is a contract carrier; or (b) the terms of applicable bill of lading form described in National Motor Freight Classification No. A3 MF-I.C.C. No. 8 issued by F. G. Freund, Agent, supplements thereto or reissues thereof, if carrier is a common carrier, provided that, if this is an intrastate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of the applicable bill of lading.

## INVOICE TO:

**Brower Construction Co**  
**P.O. Box 1137**  
**Sioux City, IA 51102**

## DESTINATION:

**Deliver to the Central Sand & Gravel Pit located**  
**approximately 6 miles north and 2 miles east of**  
**Ashland, NE.**

**MILEAGE: 102**  
**DELIVERY TIME: 19:00**  
**DELIVERY DATE: 09/01/98**

**PROJECT NUMBER: Saunders, Co. - (Yutan)**

**CONTRACT NUMBER: 988074**  
**PURCHASE ORDER #:**

**CONSIGNEE: Jebro Incorporated**  
**FREIGHT TYPE: Prepaid**  
**TIME IN: 9/1/98 14:00**  
**TIME OUT: 9/1/98 14:49**  
**CARRIER: Michael C. Harms**  
**UNIT NUMBERS: MHarms96 /Jeb204**

Carrier certifies that the cargo tank supplied for this shipment is a proper container for transportation of this commodity as described by this shipper and that proper placards have been applied.

I hereby certify that the maximum legal weight for the vehicle transporting the goods described above is: 80000

**DRIVER**

**Arrival Time:**

**Unloading Began**

**CUSTOMERX**

**Unloading Complete:**

**Pump Used or Ordered**

**Reason for Delay**

**Customer Signature**

## PRODUCT INFORMATION

**Combustible Liquid, n.o.s., NA 1993, PG III**

**Chemtrec: 1-800-424-9300**

**Jebro: 1-800-831-8037**

**Burner Fuel**

**SP.G.: 0.8870**

**lb/gal: 7.3860**

**kg/lit: 0.8850**

**Temp 174 F; 79**

**Temp adj 0.95553**

**EMERGENCY CONTACT: 1-712-277-8855**

## LOAD WEIGHTS AND QUANTITIES

**Gross Lbs 76,500 ( 34,700 kg )**  
**Tare Lbs 29,860 ( 13,544 kg )**  
**Net Lbs 46,640 ( 21,156 kg )**

**Net Tons 23.32 ( 21.16 Mg )**  
**Net Gallons @60F 6,315 ( 23,905 l )**

**Project# STPE-3425(3)**

This is to certify that the above named articles are properly described, and are packed and marked and are in proper condition for transportation according to the regulations by the Interstate Commerce Commission.

## TEMPERATURE FOR KINEMATIC VISCOSITY OF:

**300 Cs = 0**  
**150 Cs = 0**  
**200 Cs = 0**  
**50 Cs = 0**

## SEAL NUMBERS:

## CERTIFICATE OF COMPLIANCE

I certify that the asphalt material shipped on this bill of lading complies with Department of Transportation specifications for the state of **Nebraska**

The transport tank was examined and found suitable for loading.

**SHIPPER: JEBRO INC.**

**SUPPLIER AUTHORIZED REP. & WEIGHER**

**Need: "Pump"**

**Terminal: Sioux City, IA**  
**Bill of Lading Number:**

**22423**

**OFFICE COPY**

# **Midwest Laboratories, Inc.**

Report Number  
98-225-2074

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

## REPORT OF ANALYSIS

For: ( 7691) JEBRO INC  
(712)277-8855

Date Reported: 08/13/98  
Date Received: 08/04/98

### Mail to:

JEBRO INC  
2303 BRIDGEPORT DRIVE  
SIOUX CITY IA 51111-1001

PO/Proj. #: 2596  
TANK 20

Lab number: 412909      Sample ID: ID #83

Analysis	Level Found	Units	Detection Limit	Method	Analyst- Date
Total halogens	0.05	%	0.02	ASTM D1317-118	jjd-08/05
Arsenic (dissolved)	n.d.	mg/kg	5.0	EPA 6010	pmd-08/13
Cadmium (dissolved)	1.28	mg/kg	0.05	EPA 6010	pmd-08/13
Lead (dissolved)	24.4	mg/kg	0.5	EPA 6010	pmd-08/13
Chromium (dissolved)	1.6	mg/kg	0.1	EPA 6010	pmd-08/13
Ignitability	218	deg F	39	ASTM D93	jjd-08/07

### Notes:

n.d. - Not Detected.

Respectfully Submitted

  
Heather Ramig  
Client Services

7.387  
6.8  
380

*The above analytical results apply only to the sample(s) submitted.*

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Report Number  
98-210-2024

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

### REPORT OF ANALYSIS

For: ( 7691) JEBRO INC  
(712)277-8855

Date Reported: 07/29/98

Date Received: 07/08/98

#### Mail to:

JEBRO INC  
2303 BRIDGEPORT DRIVE  
SIOUX CITY IA 51111-1001

PO/Proj. #: 2567  
TANK 20

Lab number: 408025      Sample ID: ID # 82

Analysis	Level		Detection		Analyst- Date
	Found	Units	Limit	Method	
Total halogens	0.04	%	0.01	ASTM D1317-118	jjd-07/10
Arsenic (dissolved)	n.d.	mg/kg	5.0	EPA 6010	pmnd-07/28
Cadmium (dissolved)	0.85	mg/kg	0.05	EPA 6010	pmnd-07/28
Lead (dissolved)	27.3	mg/kg	0.5	EPA 6010	pmnd-07/28
Chromium (dissolved)	1.6	mg/kg	0.1	EPA 6010	pmnd-07/28
Ignitability	183	deg F	39	ASTM D93	jjd-07/15

#### Notes:

n.d. - Not Detected.

Sample was prepared for metals analysis by EPA method 3040 .

Respectfully Submitted

Heather Ramig  
Client Services

7.375  
4.670  
385

*The above analytical results apply only to the sample(s) submitted.*

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# Midwest Laboratories, Inc.

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

Report Number  
96-114-2036

## REPORT OF ANALYSIS

For: ( 7691) JEBRO INC  
(712)277-8855

Date Reported: 04/23/96  
Date Received: 04/18/96

### Mail to:

JEBRO INC  
2303 BRIDGEPORT DRIVE  
SIOUX CITY IA 51111-1001

PO/Proj. #: 436139  
USED OIL SLUDGE ANALYSIS - STRAINER

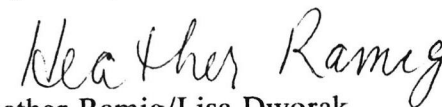
Lab number: 295669      Sample ID: TANK 38 ID # TCLP

Analysis	Level		Detection		Analyst- Date
	Found	Units	Limit	Method	
Arsenic (TCLP)	n.d.	mg/L	0.5	EPA 6010	acc-04/23
Barium (TCLP)	0.75	mg/L	0.005	EPA 6010	acc-04/23
Mercury (TCLP)	n.d.	mg/L	0.0002	EPA 7470	acc-04/23
Selenium (TCLP)	n.d.	mg/L	0.10	EPA 6010	acc-04/23
Silver (TCLP)	n.d.	mg/L	0.01	EPA 6010	acc-04/23
Chromium (TCLP)	0.04	mg/L	0.01	EPA 6010	acc-04/23
Lead (TCLP)	0.05	mg/L	0.05	EPA 6010	acc-04/23
Cadmium (TCLP)	0.01	mg/L	0.005	EPA 6010	acc-04/23
Nickel (TCLP)	0.03	mg/L	0.01	EPA 6010	acc-04/23
Copper (TCLP)	0.03	mg/L	0.01	EPA 6010	acc-04/23
Zinc (TCLP)	35.0	mg/L	0.01	EPA 6010	acc-04/23

### Notes:

n.d. - Not Detected.

Respectfully Submitted



Heather Ramig/Lisa Dworak  
Client Services

*The above analytical results apply only to the sample(s) submitted.*

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Dike Volumes at Jebro Inc.

From: Michael Marlow  
Sent: Friday, September 04, 1998 9:33 AM  
To: 'homerd@ttemi.com'  
Cc: Susan Lowery  
Subject: Dike Volumes at Jebro, Inc.

David,

I am listing the dike volumes and corresponding tank capacities that are in each dike area to help complete your inspection.

Tank Number	Dike Volume	Tank Storage Capacity
T20		83000 gals
	4,193,288 gals	
300 series tanks		100000 gals
	492,446 gals	
T18 & T29 (poly area)		17900 gals
	1,012,.672 gals	
T5		1,000,000 gals
	2,320,633 gals	

We have determined that the clay base in our containment areas is 24 inches in depth.

Please call or E mail us if we can be of further assistance.

Sincerely, Mike

**ATTACHMENT F**

**RCRIS HANDLER INFORMATION REPORT**



## RCRIS HANDLER INFORMATION REPORT

July 23, 1998

The information summarized below has been entered into EPA's RCRA Computer Data Base for the INSTALLATION LOCATION AND EPA RCRA Identification Number listed. If any of this information is inaccurate, you may notify us of the change(s) by writing to us, telephoning us, or by completing a Notification of Regulated Waste Activity Form (EPA Form 8700-12), a copy of which is attached, or simply marking any changes on this report and sending it to EPA at:

EPA REGION 7 - ARTD/RESP  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

Your cooperation in helping us to maintain accurate records is appreciated. If you have any questions, please call our Iowa RCRA Hazardous Waste Inquiry Helpline number (913) 551-7861, and leave a message. Someone will get back to you as soon as possible.

EPA RCRA ID Number: IAD020201604

Name of Company/Installation: JEBRO INC  
Location of Installation: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111  
County: WOODBURY

Mailing Address: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111

Installation Contact: SUSAN LOWREY  
Job Title: SAFETY SUPVR  
Phone Number: (712) 277-8855  
Contact's Address: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111


Current Owner of Installation: JEBRO INC  
Owner's Address: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111  
Phone Number: (712) 277-8855

Land Type: Private  
Owner Type: Private

TYPE(S) OF REGULATED ACTIVITY: USED OIL FUEL MARKETER  
USED OIL TRANSPORTER  
USED OIL TRANSPORTER - TRANSFER FACILITY

Hazardous Wastes Handled: UOIL

E 10/08/96 \* N 10/08/96 \*

  
SIGNATURE

Susan Lowrey  
Safety - Human Resource  
Supervisor  
NAME & OFFICIAL TITLE

9-1-98  
DATE SIGNED

All information you submit in a notification can be released to the public, according to the Freedom of Information Act, unless it is determined to be confidential by U.S. EPA pursuant to 40 CFR Part 2. Since notification information is very general, the U.S. EPA believes it is unlikely that any information in your notification could qualify to be protected from release. However, you may make a claim of confidentiality by printing the word "CONFIDENTIAL" on both sides of the Notification Form and on any attachments or submittals including this information report. EPA will take action on the confidentiality claims in accordance with 40 CFR Part 2.

FEB 04 1999

**MEMORANDUM**

SUBJECT: Transmittal of Used Oil Inspection Report - RCRA

FROM: Alma Moreno Lahm  
Environmental Engineer, ENSV/ARCM

TO: Jo Ann Heiman  
Chief, RESP/ARTD

This memorandum transmits the following Used Oil Inspection report performed under a work assignment managed by the Environmental Services Division, Air & RCRA Compliance Branch.

<u>Facility</u>	<u>EPA ID Number</u>	<u>Date of Inspection</u>
Jebro Inc. 2303 Bridgeport Drive Sioux City, IA 51111	IAD030301604	September 1, 1998

Attachments

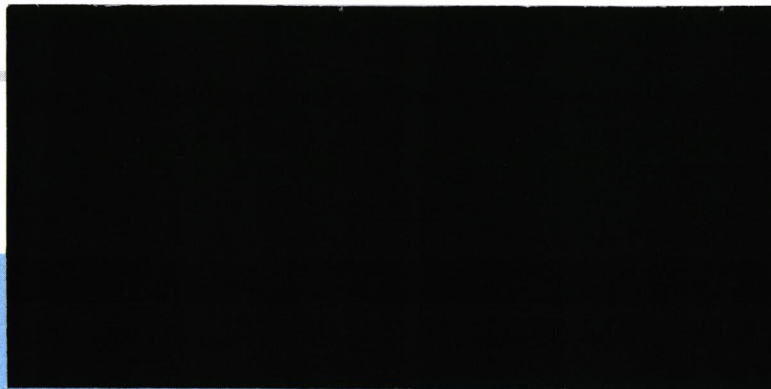
ENSV:ARCM:C:\USER\AMORENO\09RO7047\RPTTRSTD.MEM:JEBROINC.IAD.RPT:AML:8JAN99

ARCM  
MORENO LAHM

*Alma Moreno Lahm*  
1/19/99



**U.S. Environmental Protection Agency**  
**Contract No. 68-W4-0004**



**RCRA Enforcement, Permitting, and  
Assistance Contract—EPA Zone III**



**Tetra Tech EM Inc.**

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**RCRA CBI  
Confidential**



Printed on recycled paper

**IOWA USED OIL INSPECTION  
JEBRO INC.  
IAD020201604  
2303 BRIDGEPORT DRIVE  
SIOUX CITY, IOWA 51111**

**Prepared for:**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Region 7  
Kansas City, Kansas 66101**

Work Assignment Number	: R07047
EPA Region	: 7
Date Inspected	: September 1, 1998
Date Prepared	: December 11, 1998
Contract Number	: 68-W4-0004
EPA Work Assignment Manager	: Alma Moreno Lahm
Telephone Number	: (913) 551-5232
Prepared By	: Tetra Tech EM Inc.
Tetra Tech Project Manager	: Andrew Mazzeo
Telephone Number	: (913) 495-3940

**RECEIVED  
DEC 31 1998  
ARCM/ENSV**

**RCRA CBI  
Confidential**

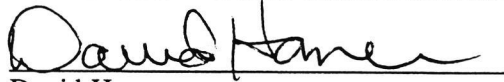
**SUMMARY OF RCRA USED OIL INSPECTION**  
**JEBRO, INC.**  
**2303 BRIDGEPORT DRIVE**  
**SIOUX CITY, IOWA 51111**  
**IAD020201604**

**Inspection Participants:** Mr. David Homer, Tetra Tech EM Inc.  
Ms. Lisa Wilson, Tetra Tech EM Inc.  
Mr. Michael K. Marlow, General Manager, Jebro Inc.  
Ms. Susan Lowery, Safety Supervisor, Jebro Inc.

**Inspection Date:** September 1, 1998

**List of Attachments:** Attachment A -- Confidential Business Information Forms  
Attachment B -- Notice of Preliminary Findings  
Attachment C -- Photographic Log  
Attachment D -- Inspection Checklists  
Attachment E -- Other Supporting Documents  
Attachment F -- RCRIS Handler Information Report

**Submitted By:**

  
David Homer  
Environmental Toxicologist

The Tetra Tech inspection team inspected the Jebro Inc. (Jebro) facility on September 1, 1998, as a used oil transporter, transfer facility, processor, and fuel marketer. The team used the used oil inspection form (Attachment D) as a basis for the inspection. The form, however, does not cover the complete requirements for a used oil transporter, processor, and fuel marketer. The purpose of this summary is to provide additional information on Jebro's activities as a transporter, processor, and fuel marketer, and should be viewed as a supplement to the used oil inspection form.

The inspection began at 13:00 with introductions and I explained the purpose of the inspection and the authority to conduct this inspection. I reviewed the facilities right to claim information as business confidential, during the inspection information was claimed as business confidential by Mr. Michael Marlow, General Manager. The information claimed as confidential is the data on the number of tanks at the facility, their capacity, and any pictures of the facility. The inspection consisted of a review of the activities at the site, a site tour, and a review of relevant electronic records and other documents.

Mr. Marlow stated that Jebro's main operation is liquid asphalt manufacturing. He stated that used oil is used in various portions of the asphalt manufacturing process; it is blended with heavier asphalt to make a lighter product, used as fuel at the plant, and sold as a fuel to asphalt batch plants.

Mr. Marlow stated Jebro, as a transporter, collects used oil from over 800 locations in Iowa, Nebraska, and South Dakota. Since Jebro is a transporter, they are subject to the requirements of 40 Code of Federal Regulations (CFR) 279 Subpart E. To meet these requirements, Jebro submitted a notification of hazardous waste activity form to the Environmental Protection Agency (EPA) on October 8, 1996 and received an EPA hazardous waste ID No. IAD020201604. Mr. Marlow explained that all used oil is transported to its facility in Sioux City, Iowa. Jebro has established procedures the drivers must follow



when accepting used oil for shipment to its facility. These procedures, as described by Mr. Marlow, are presented in the following paragraph.

The Jebro drivers are responsible for evaluating the used oil at pick up. They use their knowledge of clients' processes and an electronic sniffer to check for light end products. If the used oil fails the sniffer test, then the driver uses a chlortest kit to check for halogens. If the used oil fails this test, it is not picked up, and the driver leaves the bill of lading, unless the client provides a full chemical analysis to verify that the used oil is lower than the 1,000 parts per million (ppm) halogen limit. This procedure is meant to ensure compliance with 40 CFR 279.44. Mr. Marlow stated that Jebro keeps a hard copy of the bill of lading for each shipment for at least 3 years. Jebro maintains an electronic data base of the information from the bills of lading that date back to 1989. I reviewed a number of these bills of lading and found them in compliance with 40 CFR 279.46. The bills of lading identify the date of shipment, the generator of the used oil, and the volume of used oil accepted. During the inspection I did not observe any bills of lading that had a full chemical analysis attached supporting its compliance with the 1,000 ppm halogen limit. Mr. Marlow stated that it is very rare that supporting documentation would be provided.

Mr. Marlow explained once the used oil arrives at the facility it is unloaded into the 300 series tanks. There are 4 tanks in this series and the capacity of each tank is given below.

Tank No. 343	21,000 gallons
Tank No. 344	17,000 gallons
Tank No. 347	20,000 gallons
Tank No. 348	17,000 gallons

Mr. Marlow stated that all these tanks are connected via piping and pumps to allow for oil to be moved between the various tanks as needed. The oil from the 300 series tanks is pumped to Tank No. 20 the main supply tank and kept at 160 °F in order for the oil to be atomized in burners. Once a month, the content of this tank is sampled to determine whether the used oil meets specifications (40 CFR 279.11). Midwest Laboratory, Omaha, Nebraska, performs the analytical tests on the oil. The oil from Tank No. 20 is either piped to on-site boilers or to racks for shipment off site for use in asphalt batch plants. Jebro maintains a computer data base that tracks each off-site shipment of used oil. I reviewed the data base and found that it contains the following information on each shipment of used oil- date of shipment, destination of the shipment, volume of used oil shipped, and an analysis certification number. Mr. Marlow stated that each analysis is given a certification number and Jebro assigns the appropriate analysis certification number for each used oil shipment. The data base cross references the used oil shipments to the monthly analysis of used oil from Tank No. 20 by certification number. Mr. Marlow stated that oil from Tank No. 20 is also pumped to Tanks No. 15, 18, and 29 for on-site storage prior to burning in heaters or boilers. Tank No. 18 is the supply tank for hot oil heater in the "poly area."

Jebro acts as a used oil processor through its blending of used oil with asphalt to obtain the necessary job specifications. As noted earlier, Jebro has notified as a processor. Jebro is required to meet the general facility standards, 40 CFR 279.52. I reviewed the operation plan for the facility and observed the operation during the visual inspection of the facility. I found that the facility was operated and maintained in a manner to minimize releases and explosions as required in 40 CFR 279.52(a)(1). During the visual inspection I observed that the facility had the specific equipment and communications devices required in 40 CFR 279.52(a)(2)(3) and (4). No deficiencies were noted during the inspection.

During the visual inspection, I observed that there was adequate space between all tanks on site to meet the requirements of 40 CFR 279.52(a)(5). Mr. Marlow stated that the facility is inspected by the fire department at least once a year. During the inspection the fire department is briefed on materials handled, layout of the facility, and evacuation routes as required in 40 CFR 279.52(a)(6).

I reviewed the facility's contingency plan for compliance with 40 CFR 279.52(b) and no deficiencies were noted.

40 CFR 279.53 requires that Jebro provide information on the halogen content of the used oil. As explained earlier, Mr. Marlow stated Jebro samples Tank No. 20 once per month to ensure that the used oil meets the specifications. I reviewed the electronic data base and several analytical reports and did not identify any halogen concentrations greater than 1,000 ppm, confirming that the used oil is not a hazardous waste.

Used oil management requirements are outlined in 40 CFR 279.54. Mr. Marlow stated that Jebro stores all used oil in tanks at its facility, no containers are used and that all tanks are located in areas with secondary containment. I confirmed this information during the visual site inspection. Tetra Tech received a follow-up e-mail from Jebro on September 4, 1998 providing information on the volumes of the tanks and of the secondary containment areas for each tank (Attachment E). The message also stated that all secondary containment areas were constructed with 2 feet of compacted clay. I reviewed this information and found no deficiencies with the requirements.

As part of the inspection, I reviewed the site analysis plan, tracking system, and operating record. No deficiencies were noted with the requirements in 40 CFR 279.55, 279.56, 279.57, 279.58, and 279.59.

Jebro notified EPA that it acts as a used oil fuel marketer. Mr. Marlow stated that Jebro sells used oil as a fuel to be used in batch asphalt plants. Jebro, as described earlier, maintains an electronic database which tracks all off-site shipments of used oil and the associated certification number corresponding to appropriate the laboratory analysis performed on a sample from Tank 20, the supply tank. Mr. Marlow stated that Jebro does not provide a certification of oil quality with each shipment, although Jebro markets the oil as specification used oil. According to 40 CFR 279.61(a)(1) facilities that meet the definition of an industrial furnace are allowed to burn off-specification used oil. Mr. Marlow stated that the batch asphalt plants meet the definition of industrial furnace and the batch plants are able to accept and burn off-specification oil.

Subsequent to the inspection, Tetra Tech requested a material safety data sheet (MSDS) on the used oil that is sold for off-site use. Mr. Marlow faxed a copy of the MSDS (see Attachment E) to Tetra Tech on October 13, 1998, stating that the oil is marketed as "specification used oil."

I reviewed Jebro's notification form and shipment tracking data base for the used marketer requirements, 40 CFR 279.7 Subpart H. No deficiencies were noted during the inspection.

The inspection also included the completion of the used oil inspection form. It should be noted that the form requests the name and address of all facilities that use Jebro as a transporter of used oil. Mr. Marlow stated that this information is considered business confidential, and Jebro would supply the information directly to EPA, if requested in writing.

The inspection concluded with a discussion of the notice of preliminary findings of the inspection (see Attachment 2). The only violation noted was that Tank No. 343 was not labeled with the words "used oil" as required by 40 CFR 279.54(f). A global positioning reading was taken at the facility and the inspection concluded at 1500.

**ATTACHMENT A**  
**CONFIDENTIAL BUSINESS INFORMATION FORMS**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
CONFIDENTIALITY NOTICE

1AD0202016004

Facility Name <u>Tebro Inc.</u>	
Facility Address <u>2303 Bridgeport Dr. , Sioux City, IA. 51111</u>	
Inspector (print) <u>David Homer</u>	
U.S. EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115 <u>Tetra Tech Env Inc.</u>	Date <u>09/01/98</u>

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print)	Signature/Date

I have received this Notice and <u>DO</u> want to make a claim of confidentiality.	
Facility Representative Provided Notice (print) <u>Susan Lowrey</u>	Signature/Date <u>Susan Lowrey</u> 9-1-98

Information for which confidential treatment is requested:

- A) Tank information - capacities, volumes, storage, products  
B) Facility photos



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
RECEIPT FOR DOCUMENTS AND SAMPLES

1AD021201604

Facility Name <u>Lebro Inc.</u>
Facility Address <u>2303 Bridgeport Dr., Sioux City, IA. 51111</u>

Documents Collected? YES\_\_\_ (list below) NO\_\_\_

Samples Collected? YES\_\_\_ (list below) NO\_\_\_ Split Samples: YES\_\_\_ NO\_\_\_

Documents/Samples were: 1)Received no charge\_\_\_ 2)Borrowed\_\_\_ 3)Purchased\_\_\_

Amount Paid: \$\_\_\_ Method: Cash\_\_\_ Voucher\_\_\_ To Be Billed\_\_\_

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

- Photos (2) - front of facility (sign and tanks)  
tank #342 mixing "used oil" placed
- (2) Bill of Lading #s 038700 and 038704 (pickups) from Hawkins Construction & Fred's Freight Svc.
- (1) Bill of Lading # 22423 to Brewco Construction (delivery)
- (2) Reports & Analysis of Tank #20 from Mid West Laboratories Inc. (98-210-2024 and 98-225-2074)
- (1) Report & Analysis of used oil sludge (lab run) from Mid West Laboratories Inc. (98-101-2036)

Facility Representative (print) <u>Susan Lowrey</u>	Signature/Date <u>Susan Lowrey</u> <u>9-1-98</u>
Inspector (print) <u>David H Homer</u>	Signature/Date <u>David H Homer</u> <u>9/1/98</u>
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	

**ATTACHMENT B**  
**NOTICE OF PRELIMINARY FINDINGS**

# NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Tebro Inc.  
ADDRESS: 2203 Bridgeport Drive  
Sioux City, IA 51111  
EPA ID NUMBER: IA000201604 DATE: 09/01/98

NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.

1. Failure to label used oil tank # 343 with the words "used oil"  
40 CFR 279.22(c).
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_
6. \_\_\_\_\_
7. \_\_\_\_\_

If you have any questions regarding these findings please contact \_\_\_\_\_

The undersigned person hereby acknowledges receipt of a copy of this document and has read the same.

PRINTED NAME: Susan Lowrey TITLE: Safety and Human Resource Supervisor  
SIGNATURE: Susan Lowrey 9-1-98

This document was prepared by David Hower

**ATTACHMENT C**  
**PHOTOGRAPHIC LOG**



JEBRO, INC.  
Sioux City, Iowa



Photo No: 1 Direction Facing: Northwest Photographer: Lisa K. Wilson  
Date: 09/01/98, 1410 Description: Used oil tank #343 with "used oil" placard missing.



Photo No: 2 Direction Facing: Northwest Photographer: Lisa K. Wilson  
Date: 09/01/98, 1446 Description: Sign and tanks as viewed from entrance of parking lot on Bridgeport; silver tank #5 is used oil, the rest are asphalt.



**ATTACHMENT D**  
**INSPECTION CHECKLISTS**



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

## USED OIL INSPECTION FORM

Company Name	Jelbro Inc.	EPA Identification Number	IAD 02 02 016 044
Address & Zip	2303 Bridgeport Dr. Sioux City, IA - 51111	Telephone Number	712-277-8855
		Fax Number	712-277-8451
Company Contact	Susan Lowrey Michael K. Marlow <del>SA</del> <del>DA</del>	Title Safety Supervisor. General Manager Petroleum Recovery	
Investigator	David Homer	Investigation Date	09/01/98
At This Location Since		1972	
Number Of Employees		36	
Facility Size		32.5 acres	
Business Type		liquid asphalt manufacturing	
Used Oil Management Activities		Pickup used oil, transporter, storage, burned	
1	Describe How Used Oil Filters Are Generated		
	none	as fuel, blending agent, and sales to portable asphalt plants	
2	Used Oil Filter Generation Rate		
	not generated		

RECYCLE ♻️

3	Describe How Used Oil Filters Are Drained & Managed On-site (Obtain Photographic Documentation)
	not applicable
4	How & Where Are Used Oil Filters Disposed Of? (Obtain Written Documentation)
	not applicable
5	Amount of Used Oil Filters On-site
	not applicable
6	List the Processes That Generate Used Oil
	no generation
7	Describe How the Used Oil Generated from Each Process Is Managed On-site
	no generation
8	Used Oil Generation Rate
	not generated

9 State the Number and Size of Used Oil Storage Containers and Tanks On-site  
& the Amount of Used Oil in Each Tank and Container

Current level

Tank 5	1000,000 gallon capacity	515,928 gallons
18	9,900 gallon	5,232 gallons
20	83,000 gallons	52,272 gallons
29	8,000 gallons	3,562 gallons
343	21,000 gallons	4,142 gallons
344	17,000 gallons	14,263 gallons
348	17,000 gallons	2,803 gallons
347	20,000 gallons	— empty

10 State How Each Tank and Container Containing Used Oil Is Labeled

343 not labeled with "used oil" all other tanks  
had proper labeling.

11 For Each Tank and Container Containing Used Oil That Is Not in Good Condition.  
Describe the Condition of the Container / Tank (Obtain Photographic Documentation)

All tanks in good condition

11a Describe Any Secondary Containment (Obtain Photographic Documentation)

Has secondary containment for all tanks, bermed with  
earthen dikes.

12 Describe Any Used Oil Spills or Staining Found On-site (Obtain Photographic Documentation)

no spills found at the site.

13 Describe Used Oil/hazardous Waste Mixing Activities

no mixing of hazardous waste on-site.

14 Is used oil burned in on-site space heater?

If So State How Much Used Oil Is Burned per Year, the Design Capacity of the Space Heater,  
and If the Heater Combustion Gases Are Vented to the Outside

no space heaters on-site.



15 State Name, Address, Telephone Number, & Epa Identification Number of the Transporter That Picks up the Used Oil (Obtain Written Documentation)

Company Name

EPA Identification Number

All transportation is self transporting

Address

Telephone Number

& Zip

Company Name

EPA Identification Number

Address

Telephone Number

& Zip

16 If used oil is collected under a tolling arrangement, obtain a copy of the agreement/contract.

Not applicable

17 Describe generator used oil self-transportation activities

no self transportation - facility is a transporter of used oil. Picks up from generators and delivers oil to batch ~~pet~~ plants.

18 State the amount of used oil collected from do-it-yourselfers per month

no collection from do-it-yourselfers

19 State the amount of used oil collected from businesses per month

200,000 gallons / month approx.

20 If Used Oil Is Collected from Other Businesses.

Obtain a Copy of the Registration/ Permit/ License/ Authorization from the State / County/ Municipal Government That Allows the Company to Run a Used Oil Collection Center.

Has notified EPA as a used oil generator, fuel marketer, and transfer facility.

If No Such Documentation Is Available. Please State Such:

21 If Used Oil Is Collected from Other Businesses.

Are Shipments of Greater than 55 Gallons Accepted?

Yes

If So State the Following for Each Such Business:

800 customers, if EPA wants

Business  
Name

Telephone #

the list, will have  
it requested in ~~with~~ 5/8  
a letter from EPA.

Address  
& Zip

Contact Name

Name

Telephone #

Address  
& Zip

Contact Name

Name

Telephone #

Address  
& Zip

Contact Name

Name

Telephone #

Address  
& Zip

Contact Name

21a Describe Any Hazardous Waste Generated at Facility, (Obtain Written Documentation)

Facility Generates the Following Quantity:

~~One~~ parts washer

Facility Appears to Be:

non handler.

YES

NO

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR.

Less than 100 KG / Month

SMALL QUANTITY GENERATOR.

More than 100 KG / Month and less than 1000 KG / Month

LARGE QUANTITY GENERATOR.

More than 1000 KG / Month

22 NOTES:

Has parts washers that uses diesel fuel, the fuel is then recycled for asphalt or burned as fuel.

LIST OF HANDOUTS PROVIDED TO THE FACILITY:

- |     |   |
|-----|---|
| ✓   | Assistance/Information Handout  |
| 2 ✓ | Used Oil Filter Study Summary/Used Oil Filters Management Information |
| 3 ✓ | Copy of 40 CFR 261.(b)(13)  |
| 4 ✓ | Iowa Waste Reduction Center Pamphlet                                  |
|     |   |
|     |   |
|     |   |
|     |   |
|     |   |

I have read the above information, which was provided to the investigator. I certify that such information is true, accurate, and complete. I am aware that providing false information to the government is a criminal offense and that I can be fined and or imprisoned for doing so.

Printed Name Susan Lowrey

Signature Susan Lowrey

Date 9-1-98

**THERE IS NO CFC CHECKLIST INCLUDED IN THIS REPORT  
BECAUSE IT WAS NOT APPLICABLE**



**ATTACHMENT E**  
**OTHER SUPPORTING DOCUMENTS**

Date of Revision: 07-09-98  
Supersedes: 05-06-92  
Page 1 of 2, USED OIL

**MATERIAL SAFETY DATA SHEET**

\*\*\*\*\*  
Jebro Inc., 2303 Bridgeport Dr., Sioux City, IA 51111  
EMERGENCY PHONE: Chemtrec 1 800 424-9300  
\*\*\*\*\*

**SECTION A:**

Product Name:  
Chemical Name:

**PRODUCT IDENTITY**

**SPECIFICATION USED OIL**  
Oils, used engine

**SECTION B:**

Specific Gravity:  
Solubility in Water:  
Appearance and Odor:

**PHYSICAL AND CHEMICAL CHARACTERISTICS**

0.87-0.89  
Negligible  
Dark brown liquid, characteristic motor oil odor

**SECTION C:**

Flash Point:

Flammability Limits:  
Extinguishing Media:  
NFPA Hazard Rating:

**FIRE, EXPLOSION AND REACTIVITY DATA**

Pensky-Martins Closed Cup: 170-210°F  
Cleveland Open Cup: 300°F minimum  
Lower: N/A, Upper: N/A  
Dry chemical or foam  
Health: 1, Fire: 2, Reactivity: 0  
WARNING: Combustible liquid. Keep away from ignition sources. Use with adequate ventilation.  
Will not occur  
Incomplete combustion may produce carbon monoxide  
Stable

Hazardous Polymerization:  
Hazardous Decomposition Products:  
Stability:

**SECTION D:**

Symptoms of Exposure:  
Emergency Procedures:

**POTENTIAL HEALTH HAZARD & ENTRY ROUTES**

Headache, dizziness, nausea.

Eyes: Flush with clear water for 15 minutes. No significant irritation expected.

Skin: Prolonged or repeated contact can defat the skin and lead to irritation and/or dermatitis. Can be harmful on prolonged or repeated skin contact.

Inhalation: Avoid generation and inhalation of mists.

Ingestion: If ingested, induce vomiting. Get medical attention.

This product has a variable composition. It may contain component materials capable of producing skin cancer with varying degrees of potency in laboratory animals following frequent skin applications. This research has not been shown to have relevance to humans.

**SECTION E:****PRECAUTIONS AND PROTECTION**

Avoid skin contact. Wear gloves. Wear protective clothing, gloves and oil impervious footwear when contact is likely. Use of safety glasses is good industrial practice.

Page 2 of 2, USED OIL

**SECTION F:****SPILL OR LEAK PROCEDURES**

**Spill:** Recover free product. Add sand, clay, soil or other suitable absorbent to soak up material. Minimize skin contact. Keep spill from spreading into sewers or waterways by diking. Report spills onto navigable waterways to: National Response Center: 1 800 424-8802.

**Fire:** Asphalt cement will burn but is not readily ignitable.

**Emergency:** Phone: Chemtrec 1 800 424-9300

**SECTION G:****ADDITIONAL INFORMATION**

This MATERIAL SAFETY DATA SHEET and the information it contains is presented as accurate, complete and reliable to the best of Jebro Inc.'s knowledge and belief. Jebro Inc. does not warrant or guarantee this information and shall not be liable for any loss or damages arising out of the use thereof. It is the responsibility of each individual user to satisfy itself that the information presented in this document is suitable and complete for its particular use.

Prepared by: Jebro, Inc., 2303 Bridgeport Drive, Sioux City, IA 51111  
Phone 712 277-8955

DATE 8-31-78 TERMINAL NO. Si City  
CARRIER NO. 513 KITS 0  
PG 745 HALOGENS/SNIFFER OK  
TERMS 24 TANK # 34

CUST. P.O. NO. \_\_\_\_\_

PA I.D. NO IAD020201604

DOT NO. 245090

US DOT HAZMAT REG. NO. 060598 007 019

EMERGENCY TELEPHONE NO. 1-800-424-9300

038704

# MOTOR CARRIER BILL OF LADING

Received, subject to tariffs and/or contract in effect on date of issuance hereof.

*Hackins Const.  
2512 New Park  
Concord, NE*

CUST. NO.: \_\_\_\_\_

CONSIGNED TO OR SOLD TO: **JEBRO INC.**

1-800-831-8037

SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
Gasoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	250	250				N/A
	Fuel Oil						
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
her							
her							

THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

## GENERATOR'S REPRESENTATION

The generator hereby warrants that the material released to the carrier is represented free of hazardous waste under RCRA. Misrepresentation of this material is the generator's legal and financial responsibility to correct damages.

SHIPPER N/A CARRIER [Signature]

"This shipment shall be governed by (A) the contract between shipper and carrier, if a contract carrier, or (B) the terms of the applicable bill of lading form described in the National Motor Freight Classification No. A9, MF-1 C. C.-9, supplements thereto or reissues thereof, if carrier is a common carrier, provided that if this is an interstate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of applicable bill of lading."

Carrier certifies that the cargo tank supplied for this shipment is a proper container for this commodity as described by the shipper."

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER

DATE 8-31-98 TERMINAL NO. 5074  
CARRIER NO. 313 KITS 00  
PG 745 HALOGENS/SNIFFER OK  
RMS AK TANK # 34

1ST. P.O. NO. \_\_\_\_\_

EPA I.D. NO IAD020201604

DOT NO. 245090

DOT HAZMAT REG. NO. 060598 007 019

EMERGENCY TELEPHONE NO. 1-800-424-9300

038700

**MOTOR CARRIER BILL OF LADING**

Received, subject to tariffs and/or contract in effect on date of issuance hereof.

*Free Friendly Service*  
*201 Leonard St*  
*Omaha NE*

CUST. NO.: \_\_\_\_\_

CONSIGNED TO OR SOLD TO: **JEBRO INC.**  
1-800-831-8037

SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
Gasoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	400	400				N/C
	Fuel Oil						
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
Other							

SHIPPER IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

**GENERATOR'S REPRESENTATION**

The generator hereby warrants that the material released to the carrier is represented free of hazardous waste under RCRA. Misrepresentation of this material is the generator's legal and financial responsibility to correct damages.

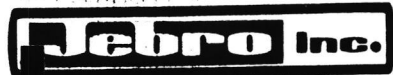
SHIPPER \_\_\_\_\_ CARRIER AK

"This shipment shall be governed by (A) the contract between shipper and carrier, if a contract carrier, or (B) the terms of the applicable bill of lading form described in the National Motor Freight Classification No. A9. MF-1 C. C.-9, supplements thereto or reissues thereof, if carrier is a common carrier, provided that if this is an interstate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of applicable bill of lading."

Carrier certifies that the cargo tank supplied for this shipment is a proper container for this commodity as described by the shipper."

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER





# MOTOR CARRIER BILL OF LADING ORIGINAL

This shipment shall be governed by (a) the contract between shipper and carrier, if carrier is a contract carrier; or (b) the terms of applicable bill of lading form described in National Motor Freight Classification No. A3 MF-I.C.C. No. 8 issued by F. G. Freund, Agent, supplements thereto or reissues thereof, if carrier is a common carrier, provided that, if this is an intrastate shipment by a common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of the applicable bill of lading.

## VOICE TO:

**Jrower Construction Co**  
**P.O. Box 1137**  
**Sioux City, IA 51102**

## ESTINATION:

**Deliver to the Central Sand & Gravel Pit located**  
**approximately 6 miles north and 2 miles east of**  
**Ashland, NE.**

**MILEAGE: 102**  
**DELIVERY TIME: 19:00**  
**DELIVERY DATE: 09/01/98**

**PROJECT NUMBER: Saunders, Co. - (Yutan)**

**CONTRACT NUMBER: 988074**  
**PURCHASE ORDER #:**

**CONSIGNEE: Jebro Incorporated**  
**FREIGHT TYPE: Prepaid**  
**TIME IN: 9/1/98 14:00**  
**TIME OUT: 9/1/98 14:49**  
**CARRIER: Michael C. Harms**  
**UNIT NUMBERS: MHarms96 /Job204**

Carrier certifies that the cargo tank supplied for this shipment is a proper container for transportation of this commodity as described by this shipper and that proper placards have been applied.

I hereby certify that the maximum legal weight for the vehicle transporting the

goods described above is: 80000

**DRIVER**

**Arrival Time:** \_\_\_\_\_  
**Unloading Began:** \_\_\_\_\_

**CUSTOMER**

**Unloading Complete:** \_\_\_\_\_  
**Pump Used or Ordered:** \_\_\_\_\_  
**Reason for Delay:** \_\_\_\_\_

**Customer Signature**

## PRODUCT INFORMATION

**Combustible Liquid, n.o.s., NA 1993, PG III**

**Chemtec: 1-800-424-9300**

**Jebro: 1-800-831-8037**

**Burner Fuel**

**SP.G.: 0.8870**

**lb/gal: 7.3860**

**kg/lt: 0.8850**

**Temp 174 F; 79**

**Temp adj 0.95550**

**EMERGENCY CONTACT: 1-712-277-8855**

## LOAD WEIGHTS AND QUANTITIES

<b>Gross Lbs</b>	<b>76,500</b>	<b>( 34,700 kg )</b>
<b>Tare Lbs</b>	<b>29,860</b>	<b>( 13,544 kg )</b>
<b>Net Lbs</b>	<b>46,640</b>	<b>( 21,156 kg )</b>

<b>Net Tons</b>	<b>23.32</b>	<b>( 21.16 Mg )</b>
<b>Net Gallons @60F</b>	<b>6,315</b>	<b>( 23,905 l )</b>

**Project# STPE-3425(3)**

This is to certify that the above named articles are properly described, and are packed and marked and are in proper condition for transportation according to the regulations by the Interstate Commerce Commission.

## TEMPERATURE FOR KINEMATIC VISCOSITY OF:

<b>300 Cs =</b>	<b>0</b>
<b>150 Cs =</b>	<b>0</b>
<b>200 Cs =</b>	<b>0</b>
<b>50 Cs =</b>	<b>0</b>

## SEAL NUMBERS:

## CERTIFICATE OF COMPLIANCE

I certify that the asphalt material shipped on this bill of lading complies with Department of Transportation specifications for the state of **Nebraska**

The transport tank was examined and found suitable for loading.

**SHIPPER: JEBRO INC.**

**SUPPLIER AUTHORIZED REP. & WEIGHER**

**Need: \*\*Pump\*\***

**Terminal: Sioux City, IA**  
**Bill of Lading Number:**

**22423**

**OFFICE COPY**

# **MidWest Laboratories, Inc.**

Report Number  
98-225-2074

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

## REPORT OF ANALYSIS

For: ( 7691) JEBRO INC  
(712)277-8855

Date Reported: 08/13/98  
Date Received: 08/04/98

### Mail to:

JEBRO INC  
2303 BRIDGEPORT DRIVE  
SIOUX CITY IA 51111-1001

PO/Proj. #: 2596  
TANK 20

Lab number: 412909      Sample ID: ID #83

Analysis	Level		Detection		Analyst- Date
	Found	Units	Limit	Method	
Total halogens	0.05	%	0.02	ASTM D1317-118	jjd-08/05
Arsenic (dissolved)	n.d.	mg/kg	5.0	EPA 6010	pmd-08/13
Cadmium (dissolved)	1.28	mg/kg	0.05	EPA 6010	pmd-08/13
Lead (dissolved)	24.4	mg/kg	0.5	EPA 6010	pmd-08/13
Chromium (dissolved)	1.6	mg/kg	0.1	EPA 6010	pmd-08/13
Ignitability	218	deg F	39	ASTM D93	jjd-08/07

### Notes:

n.d. - Not Detected.

Respectfully Submitted

  
Heather Ramig  
Client Services

7.387  
6.8  
380

*The above analytical results apply only to the sample(s) submitted.*

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Report Number  
98-210-2024

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

### REPORT OF ANALYSIS

For: ( 7691) JEBRO INC  
(712)277-8855

Date Reported: 07/29/98

Date Received: 07/08/98

**Mail to:**

JEBRO INC  
2303 BRIDGEPORT DRIVE  
SIOUX CITY IA 51111-1001

PO/Proj. #: 2567  
TANK 20

Lab number: 408025      Sample ID: ID # 82

Analysis	Level		Detection		Analyst- Date
	Found	Units	Limit	Method	
Total halogens	0.04	%	0.01	ASTM D1317-118	jjd-07/10
Arsenic (dissolved)	n.d.	mg/kg	5.0	EPA 6010	pmd-07/28
Cadmium (dissolved)	0.85	mg/kg	0.05	EPA 6010	pmd-07/28
Lead (dissolved)	27.3	mg/kg	0.5	EPA 6010	pmd-07/28
Chromium (dissolved)	1.6	mg/kg	0.1	EPA 6010	pmd-07/28
Ignitability	183	deg F	39	ASTM D93	jjd-07/15

**Notes:**

n.d. - Not Detected.

Sample was prepared for metals analysis by EPA method 3040 .

Respectfully Submitted

Heather Ramig  
Client Services

7. 375  
4. 670  
385

*The above analytical results apply only to the sample(s) submitted.*



Report Number  
96-114-2036

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121  
**REPORT OF ANALYSIS**

For: ( 7691) JEBRO INC  
(712)277-8855

Date Reported: 04/23/96  
Date Received: 04/18/96

**Mail to:**

JEBRO INC  
2303 BRIDGEPORT DRIVE  
SIOUX CITY IA 51111-1001

PO/Proj. #: 436139  
USED OIL SLUDGE ANALYSIS - STRAINER

Lab number: 295669      Sample ID: TANK 38 ID # TCLP

Analysis	Level Found	Units	Detection Limit	Method	Analyst-Date
Arsenic (TCLP)	n.d.	mg/L	0.5	EPA 6010	acc-04/23
Barium (TCLP)	0.75	mg/L	0.005	EPA 6010	acc-04/23
Mercury (TCLP)	n.d.	mg/L	0.0002	EPA 7470	acc-04/23
Selenium (TCLP)	n.d.	mg/L	0.10	EPA 6010	acc-04/23
Silver (TCLP)	n.d.	mg/L	0.01	EPA 6010	acc-04/23
Chromium (TCLP)	0.04	mg/L	0.01	EPA 6010	acc-04/23
Lead (TCLP)	0.05	mg/L	0.05	EPA 6010	acc-04/23
Cadmium (TCLP)	0.01	mg/L	0.005	EPA 6010	acc-04/23
Nickel (TCLP)	0.03	mg/L	0.01	EPA 6010	acc-04/23
Copper (TCLP)	0.03	mg/L	0.01	EPA 6010	acc-04/23
Zinc (TCLP)	35.0	mg/L	0.01	EPA 6010	acc-04/23

**Notes:**

n.d. - Not Detected.

Respectfully Submitted

*Heather Ramig*  
Heather Ramig/Lisa Dworak  
Client Services

*The above analytical results apply only to the sample(s) submitted.*

Our reports and letters are for the exclusive and confidential use of our clients and may not be reproduced in whole or in part, nor may any reference be made to the work, the results, or the company in any advertising, news release, or other public announcements without obtaining our prior written authorization.

Dike Volumes at Jebro Inc.

From: Michael Marlow  
Sent: Friday, September 04, 1998 9:33 AM  
To: 'homerd@ttemi.com'  
Cc: Susan Lowery  
Subject: Dike Volumes at Jebro, Inc.

David,

I am listing the dike volumes and corresponding tank capacities that are in each dike area to help complete your inspection.

Tank Number	Tank Storage Capacity
Dike Volume	
T20	83000 gals
	4,193,288 gals
300 series tanks	100000 gals
	492,446 gals
T18 & T29 (poly area)	17900 gals
	1,012,.672 gals
T5	1,000,000 gals
	2,320,633 gals

We have determined that the clay base in our containment areas is 24 inches in depth.

Please call or E mail us if we can be of further assistance.

Sincerely, Mike



**ATTACHMENT F**  
**RCRIS HANDLER INFORMATION REPORT**

## RCRIS HANDLER INFORMATION REPORT

July 23, 1998

The information summarized below has been entered into EPA's RCRA Computer Data Base for the INSTALLATION LOCATION AND EPA RCRA Notification Number listed. If any of this information is inaccurate, you may notify us of the change(s) by writing to us, telephoning us, or by completing a Notification of Regulated Waste Activity Form (EPA Form 8700-12), a copy of which is attached, or simply marking any changes on this report and sending it to EPA at:

EPA REGION 7 - ARTD/RESP  
726 MINNESOTA AVENUE  
KANSAS CITY, KANSAS 66101

Your cooperation in helping us to maintain accurate records is appreciated. If you have any questions, please call our Iowa RCRA Hazardous Waste Inquiry Helpline number (913) 551-7861, and leave a message. Someone will get back to you as soon as possible.

EPA RCRA ID Number: IAD020201604

Name of Company/Installation: JEBRO INC  
Location of Installation: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111  
County: WOODBURY

Mailing Address: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111

Installation Contact: SUSAN LOWREY  
Job Title: SAFETY SUPVR  
Phone Number: (712)277-8855  
Contact's Address: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111

Current Owner of Installation: JEBRO INC  
Owner's Address: 2303 BRIDGEPORT DR  
City/State/Zip: SIOUX CITY, IA 51111  
Phone Number: (712)277-8855

and Type: Private  
Owner Type: Private

TYPE(S) OF REGULATED ACTIVITY: USED OIL FUEL MARKETER  
USED OIL TRANSPORTER  
USED OIL TRANSPORTER - TRANSFER FACILITY

Hazardous Wastes Handled: UOIL

10/08/96 \* N 10/08/96 \*

  
SIGNATURE

Susan Lowrey  
Safety - Human Resource  
Supervisor  
NAME & OFFICIAL TITLE

9-1-98  
DATE SIGNED

The information you submit in a notification can be released to the public, according to the Freedom of Information Act, unless it is determined to be confidential by U.S. EPA pursuant to 40 CFR Part 2. Since notification information is very general, the U.S. EPA believes it is unlikely that any information in your notification could qualify to be protected from release. However, you may make a claim of confidentiality by printing the word "CONFIDENTIAL" on both sides of the Notification Form and on any attachments or documents including this information report. EPA will take action on the confidentiality claims in accordance with 40 CFR Part 2.